

CONSULTATION AND COORDINATION

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SUMMARY OF PUBLIC INVOLVEMENT

The National Park Service has sought the public's views on wilderness throughout the wilderness study process. The input was used to help identify the issues to be addressed in the environmental impact statement, and to identify and help shape the alternatives.

A "notice of intent" to prepare a wilderness suitability study and environmental impact statement for Apostle Islands National Lakeshore was published in the *Federal Register* (volume 66, number 198, pages 52151-52152) on October 12, 2001. The National Park Service held meetings, and issued press releases and Internet messages on the park's web site to provide opportunities for the public, agencies, and organizations to identify issues and concerns for the study (see below).

A total of 4,512 separate written comments were received through the mail, FAX, and the Internet between July 2001 (when the National Park Service held a public meeting on the study in Bayfield) and February 1, 2002, when the scoping comment period closed.¹ Two petitions also were also received, with a total of 895 names.

WRITTEN COMMUNICATIONS AND THE INTERNET

A variety of techniques were used to keep the public informed about the wilderness

study and to solicit input. During the study process a mailing list of over 4,200 names was compiled. The list included officials from other state and federal governmental agencies, federal and state legislators, Indian tribal governments, local and regional governments, businesses, organizations, and interested citizens. A post card was mailed in the spring of 2002 asking people if they wanted hard copies of the study documents and encouraging use of the Internet to access the documents. The public mailing list was subsequently pared down to about 300.

Press releases were issued at key points during the study, including the initiation of the study (May 8, 2001), the announcement of the Bayfield scoping open house (July 17, 2001), an extension of the scoping comment period (November 20, 2001), another extension of the scoping period (January 9, 2002), and an announcement that the preliminary alternatives were ready for public input and a schedule of open houses (June 18, 2002).

The Internet was used extensively to publicize the study, inform people about the study and meetings, and provide a means for people to provide input.

The park's Internet web site (<http://www.nps.gov/apis/study.htm>) included all publications, messages on the status of the study, a timeline, a "frequently asked questions" section, and contacts for additional information.

1. Officially, the scoping comment period did not begin until the "notice of intent" was published in the *Federal Register* on October 12, 2001, but was extended to January 15, 2002, and then again to February 1, to provide the public with additional time to provide input to the NPS study team.

A newsletter was sent to the public in November 2001. This newsletter was an update on the study and was published shortly after the *Federal Register* notice of intent was published. It summarized comments that had been received to date, noted key issues and concerns, announced that the comment period had been extended, encouraged people to provide comments on the study, and provided a schedule for the project.

An alternatives workbook was published in May 2002 and also placed on the park's web site. The workbook summarized the purpose of the study and the scoping comments, provided responses to several concerns raised by the public during the scoping period, noted areas that the study had determined were not suitable for wilderness, and identified six preliminary alternatives. A schedule for the study and a comment response form were also included in the workbook. Approximately 1,000 copies of the alternatives workbook were printed and distributed to the mailing list and handed out at various meetings. In addition, the workbook was downloaded from the study web site nearly 3,000 times during the comment period. Between June 20 and August 1, 2002, when the comment period closed, a total of 1,784 written comments were received via response forms, letters, e-mails, and faxes.

PUBLIC, AGENCY, AND ORGANIZATIONAL MEETINGS

The study team held many meetings during the course of the study. At the beginning of the study (2001), park staff met with a variety of local, state, and tribal agencies and governments to identify issues and concerns for the study, including the State of Wisconsin Historic Preservation Office (July 31, 2001), Bad River and Red Cliff Bands of Lake

Superior Chippewa (June 21 and June 29, 2001), Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission (September 6, 2001), United States Fish and Wildlife Service (December 18, 2001), United States Geological Survey (December 18, 2001), Wisconsin Department of Natural Resources (September 13, 2001), Bayfield County Board of Supervisors (June 26, 2001), Mayor of Ashland (June 28, 2001), Bayfield City Council (July 18, 2001), Chair of the Town of La Pointe (July 23, 2001), Town of Russell Board of Supervisors (August 14, 2001), and the Ashland Chamber of Commerce (June 28, 2001).

On July 25, 2001, a public open house was held in Bayfield, Wisconsin, to identify the public's issues and concerns regarding designating wilderness in the Apostle Islands National Lakeshore. A total of 78 people attended.

After the preliminary alternatives workbook was distributed, the study team held more meetings with the public, governments, agencies, and organizations. On May 16, 2002, letters of invitation were sent to the following governments, agencies, and organizations inviting them to meet with study team members during the 2002 alternatives workbook comment period:

- Ashland County Board of Supervisors
- Bayfield County Board of Supervisors
- Red Cliff Band of Lake Superior Chippewa Indians
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Bay Mills, Bois Forte, Fond du Lac, Grand Portage, Keweenaw Bay, Lac Courte Oreilles, Lac du Flambeau, Lac Vieux Desert, Mille

- Lacs, Mole Lake, and St. Croix Bands of Chippewa Indians
- Great Lakes Indian Fish and Wildlife Commission
- Cities of Ashland, Bayfield, and Washburn
- Towns of Bayfield, La Pointe, Russell, and Sanborn
- Chambers of Commerce of Ashland, Bayfield, and Washburn
- State of Wisconsin
- United States and state of Wisconsin senators and representatives

Invitations to meet were also extended to the Wisconsin State Historic Preservation Office, the Wisconsin Department of Natural Resources, and the U.S. Fish and Wildlife Service. Informal invitations were extended to numerous civic organizations, boating organizations, and user groups during the course of the comment period.

Park staff met with all entities that responded to the invitation, including the Lac du Flambeau, Lac Vieux Desert, Red Cliff, and Bad River Bands of Chippewa Indians (June 10, June 14, June 18, and July 3, 2002, respectively), Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission (June 6, 2002), Ashland County Board of Supervisors (July 24, 2002), Bayfield City Council (June 12, 2002), Bayfield Chamber of Commerce (June 19, 2002), Town of Russell Board of Supervisors (July 22, 2002), Town of Bayfield Board of Supervisors (July 15, 2002), staff at local marinas (June 20, 2002), Bayfield Yacht Club (July 27, 2002), Duluth Power Squadron (September 19, 2002), and the Pikes Creek Keel Club (October 5, 2002). In addition, park staff met with the Wisconsin state preservation office on December 9, 2002.

The study team held five public open houses during the summer of 2002 to seek public views, concerns, and issues regarding the preliminary alternatives. The open houses were held July 5 at the Stockton/Presque Isle Visitor Center in Apostle Islands National Lakeshore, July 8 at Odanah, Wisconsin, July 9 at Bayfield, Wisconsin, July 10 at Red Cliff, Wisconsin, and July 11 at Saint Paul, Minnesota. About 175 people attended the five meetings.

CONSULTATIONS WITH NATIVE AMERICAN TRIBES

As noted above, several meetings were held with various Indian tribes from both an on-and off-reservation perspective. At each of these meetings, park staff assured tribal leaders that the tribes' rights would continue to be honored regardless of whether wilderness eventually is designated by Congress. Both the Red Cliff and Bad River bands recommended that guarantees of those rights be specifically inserted into any legislation that might be drafted for wilderness designation. In addition, the Bad River Band expressed concern over Long Island (known to the tribe as Chequamegon Point) being included within designated wilderness.

As for off-reservation issues, the Great Lakes Indian Fish and Wildlife Commission's Voigt Intertribal Task Force and the park formed a joint workgroup which met on more than 10 occasions and thus provided a forum for ongoing and recurring consultation. The Task Force, which consists of nine tribes that signed the 1842 treaty, neither specifically endorsed nor rejected a wilderness designation for the park provided that the park's recommended alternative would in no way abrogate or diminish their treaty rights guaranteed in that treaty. Among other

things, the joint Task Force/park workgroup explored ways in which the park could be administered and preserved consistent with the tribes' rights and provided recommended language for inclusion in this document toward that end.

CONSULTATION WITH THE WISCONSIN STATE HISTORICAL PRESERVATION OFFICE (SHPO)

Members of the study team met three times with compliance staff in the Wisconsin State Historical Preservation Office. The SHPO staff acknowledged that wilderness is very protective of archeological resources due to the low likelihood of ground disturbance, but also expressed concern that wilderness designation may make it more difficult to perform archeological surveys in the future. The SHPO staff was also concerned that management's flexibility to choose certain treatment options (such as restoration or reconstruction) would be limited in designated wilderness. They believe this may result in an increased likelihood that certain cultural resources would be left to molder in the field.

The SHPO staff was mailed a copy of the draft document in July 2003. They provided no comments on the draft study.

CONSULTATIONS WITH THE U.S. FISH AND WILDLIFE SERVICE (USFWS)

The study team initiated informal consultation with the Endangered Species Field Office of the U.S. Fish and Wildlife Service in Green Bay, Wisconsin, in June 2001. The Fish and Wildlife Service has indicated that due to the nature of wilderness, the threatened or endangered species

known to exist in the park will not be affected (see appendix B).

COASTAL ZONE CONSISTENCY DETERMINATION

Federal agency activities in or affecting Wisconsin's coastal zone must comply with §307 of the Coastal Zone Management Act and implementing regulations, which require that such federal activities be conducted in a manner consistent to the maximum extent practicable with Wisconsin's Coastal Management Program.

Although all of Apostle Islands National Lakeshore is federal land and excluded from Wisconsin's coastal zone, the park is geographically within the coastal zone. The National Park Service has determined that the preferred alternative described in this document is consistent with Wisconsin's Coastal Management Program, including the state's goals and policies for this area.

This final wilderness study/EIS provides the substantive basis for the National Park Service's consistency determination and it has submitted this document to the Wisconsin Coastal Management Council for its concurrence. This consistency determination and the Council's concurrence complies with the requirements of the Coastal Zone Management Act. If the state of Wisconsin concurs with the National Park Service's consistency determination, it will transmit its formal concurrence, which will be acknowledged in the record of decision for the wilderness study.

PUBLIC OFFICIALS, AGENCIES, AND ORGANIZATIONS TO WHOM COPIES OF THE FINAL STUDY WERE SENT

The National Park Service is circulating the *Final Wilderness Study/Environmental Impact Study* to the agencies and organizations listed below. A limited number of copies of the wilderness study are available upon request by interested individuals. Copies of the document are also available for review at the park, on the Internet (<http://www.nps.gov/apis/wstudy.htm>) and at libraries.

(An asterisk [*] indicates that a comment on the *Draft Wilderness Study / Environmental Impact Statement* was received from this organization.)

CONGRESSIONAL DELEGATION

Representative David Obey
Senator Russell Feingold
Senator Herb Kohl

STATE AND LOCAL ELECTED OFFICIALS

Representative Gary Sherman
Senator Bob Jauch

FEDERAL AGENCIES

Advisory Council on Historic Preservation
Army Corps of Engineers
Great Lakes Commission
Natural Resource Conservation Service
Northern Great Lakes Visitor Center
U.S. Department of Agriculture
Forest Service
Chequamegon-Nicolet
National Forests

U.S. Department of the Interior
Bureau of Indian Affairs
National Park Service
Grand Portage National Monument
Ice Age and North Country
National Scenic Trails
Keweenaw Historical Park
Indiana Dunes National Lakeshore
Isle Royale National Park
Midwest Archaeological Center
Pictured Rocks National Lakeshore
Saint Croix National Scenic Riverway
Sleeping Bear Dunes National Lakeshore
Voyageurs National Park
U.S. Fish and Wildlife Service, Endangered Species Field Office, Green Bay
U.S. Coast Guard
U.S. Environmental Protection Agency, Region 5*

NATIVE AMERICAN TRIBES AND AGENCIES

Chippewa Indian Bands
Lac du Flambeau
Lac Vieux Desert
Lac Courte Oreilles
Red Cliff
Bad River
Bay Mills
Bois Forte
Fond du Lac
Grand Portage
Keweenaw Bay
Mille Lacs
Mole Lake
St. Croix

Voigt Intertribal Task Force of the Great
Lakes Indian Fish and Wildlife
Commission

STATE OF WISCONSIN AGENCIES

Department of Natural Resources
Department of Tourism
Natural Resources Board*
Northwest Regional Planning Commission
Office of the Governor*
State Historical Preservation Office
State Historical Society
Wisconsin Coastal Management Program*

LOCAL AND REGIONAL GOVERNMENT AGENCIES

Ashland County Board of Supervisors
Bayfield County Board of Supervisors
Bayfield County Forest
City of Ashland
City of Bayfield
City of Washburn
Town of Bayfield*
Town of Bell
Town of LaPointe
Town of Russell*
Town of Sanborn

ORGANIZATIONS AND BUSINESSES

Adventures in Perspective
Alliance for Sustainability
Animaashi Sailing Company
Apostle Islands Cruise Service
Apostle Islands Marina
Ashland Chamber of Commerce
Ashland Marina
Association of Wisconsin
Snowmobile Clubs
Bayfield Chamber of Commerce*
Bayfield Heritage Association
Bayfield Yacht Club
Bruce River Canoe Rental
Camp Amnicon

Camp Manio-wish
Camp Voyageur
Catchun-Sun Charter Co.
Chequamegon Adventure Company
Chequamegon Audubon Society*
Citizens Against Apostle Islands
Wilderness*
Duluth Power Squadron
Friends/Boundary Waters Wilderness*
Glacier Valley Wilderness Adventures
Great Lakes Cruising Club
Great Lakes Sport Fishing Council
Howard County Bird Club*
Izaak Walton League*
Madeline Island Chamber of Commerce
National Audubon Society
National Park Foundation
National Parks Conservation Association*
National Trust for Historic Preservation
National Wildlife Federation
Northland College
NW Passage Outing Club, Inc.
Public Employees for Environmental
Responsibility (PEER) *
Pikes Bay Marina
Pikes Creek Keel Club
Port Superior Marina
Red Cliff Marina
Roberta's Charters
Sailboats, Inc.
Schooner Bay Marina
Sierra Club
Midwest Office
John Muir Chapter*
Siskiwit Bay Marina
Superior Charters, Inc.
Superior Sailor
The Nature Conservancy
Trek and Trail
University of Minnesota
Voyageur Outward Bound School
Washburn Chamber of Commerce
Washburn Marina
Wilderness Inquiry
Wilderness Society*

LIBRARIES

Ashland Public Library
Duluth Public Library
University of Minnesota, Forestry Library
University of Wisconsin, Madison
(Steenbock Library)
Washburn Public Library

MEDIA

County Journal
The Daily Press
Duluth News-Tribune
Ironwood Daily Globe
The Journal
The Journal Times

KADL Radio
KBJR TV Duluth
KDLH TV Duluth
Lake Superior Magazine
Madison Capitol Times
Milwaukee Journal Sentinel
Minneapolis Star Tribune
The Outdoor Network
St. Paul Pioneer Press
Superior Evening Telegram
WATW (AM 1400)
WDIO TV, Duluth
WDSE TV, Duluth
WEGZ Eagle 106
Wisconsin Public Radio

PUBLIC REVIEW OF THE DRAFT WILDERNESS STUDY/ENVIRONMENTAL IMPACT STATEMENT

This section includes a summary of comments received through letters, e-mail messages, and public meetings following the release of the *Draft Wilderness Study/Environmental Impact Statement* on July 11, 2003. All oral and written comments were considered during the preparation of the *Final Environmental Impact Statement* according to the requirements of 40 CFR 1503. The comments allow the study team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals regarding the preferred alternative, the other alternatives, and their potential impacts. *It is important to stress that the selection of the preferred alternative and any revisions to the alternative were not based solely on how many people supported a particular alternative.*

The section begins with summaries of the public meetings and written comments. Next, comment letters from all federal, state, and local agencies, and private organizations are reproduced and responses are included for all substantive comments. In addition, responses are provided for other agency, organization, and individual comments the study team believed merited a response (e.g., comments that reflected misinformation or misperceptions).

Where appropriate, the text in the *Final Environmental Impact Statement* has been revised to address the comments. These changes are identified in the NPS responses. No response was given to comments simply expressing preference for an alternative.

The Council on Environmental Quality guidelines (1978) for implementing the National Environmental Policy Act require the National Park Service to respond to “substantive comments.” A comment is substantive if it meets any of the following criteria from Director’s Order 12, “Conservation Planning, Environmental Impact Analysis and Decision-Making” (NPS 2001).

- It questions, with reasonable basis, the accuracy of information.
- It questions, with reasonable basis, the adequacy of environmental analysis.
- It presented reasonable alternatives other than those proposed in the environmental impact statement.
- It would cause changes or revisions in the preferred alternative.

Most comments from individuals expressed opinions about the preferred alternative and therefore were not responded to or reproduced in this document. (A complete record of individuals who received copies of the draft document and of comments received on the draft study, including copies of all letters and e-mail messages, is on file at the park headquarters. People wishing to review the comment letters should contact the wilderness study coordinator: Route 1, Box 4, Bayfield, WI 54814; 715/779-3398, x102.)

RECORD OF PUBLIC COMMENT

A notice of availability of the draft document was published in the *Federal Register* on July 11, 2003 (68 FR 41398-41399). Approximately 300 copies of the draft were distributed to government agencies, public interest groups, businesses, media, local libraries, and individuals. The document was also posted on the park's Internet web site for review.

Written comments on the draft document were accepted for over 90 days. The public comment period closed on October 17, 2003. In addition, nine public meetings were held in July and August to solicit public input, and one formal public hearing was held on August 27. Notice of the public hearing was published in the local newspapers.

SUMMARY OF THE PUBLIC, AGENCY, AND ORGANIZATIONAL MEETINGS

A series of public open houses were held at Stockton Island in the park (July 26, 2003), at park headquarters (July 29), and in Red Cliff (July 30), Odanah (August 4), LaPointe (August 11), and Ashland, Wisconsin (August 14). Open houses were also held in Duluth (August 5) and St. Paul, Minnesota (August 19), and in Madison, Wisconsin (August 20). A total of 139 people attended the open houses. The vast majority of the people attending the open houses did so because they were interested in learning more about the study and its alternatives. Many questions were answered, and while many of the conversations were lengthy and informative, very few oral comments were received. Most attendees stated a desire to comment in writing after thinking more about the alternatives and studying the document.

One person commented at the Stockton Island open house that to maximize flexibility with respect to docks in the future, the wilderness boundaries should be drawn around all areas where docks have existed historically.

In accordance with Wilderness Act requirements, a formal public hearing was held at the Northern Great Lakes Visitor Center near Ashland, Wisconsin, on August 27, 2003. The hearing officer was the Regional Director of the NPS Midwest Region, Ernie Quintana. Participants had the opportunity to speak for five minutes, and their comments were recorded and transcribed by a professional court reporter. In all, 18 persons spoke at the hearing; 12 of them supported wilderness (one supported alternative B, eight supported alternative C, one supported a modified alternative C, and two supported wilderness without expressing a preference for a particular alternative), four of them were opposed to wilderness (alternative A), and two had no discernible opinion. Copies of the hearing transcripts can be viewed at Apostle Islands National Lakeshore headquarters in Bayfield.

Finally, park staff was invited to speak and answer questions at a number of meetings. Attendees included: Institutes for Journalism in Natural Resources, Alliance for Sustainability Steering Committee, Inland Sea Society, Wisconsin Natural Resources Board, Bayfield Brunch Bunch, Ashland Chamber of Commerce, Ashland/Bayfield League of Conservation Voters, Bayfield Chamber of Commerce, Ashland/Bayfield Republican Committee, and League of Women Voters. Park staff also met with the Red Cliff Tribal Council, the Voigt Intertribal Task Force, Town of Russell Board of Supervisors, Bayfield County Board of Supervisors, Bayfield City Council, and the Town of Bayfield.

Information was provided at these meetings which these organizations or government bodies used in the preparation of written comments.

SUMMARY OF THE WRITTEN COMMENTS

The wilderness study team received over 3,500 separate written responses during the comment period, including letters, FAXes, postcards, e-mail comments, and written comments provided at the public hearing. Of those responses, 19 were from agencies and organizations, including one federal agency, the governor of Wisconsin, two state agencies, two local governments, eight conservation groups, and four other special interest groups. All of the other responses were from individuals and businesses. Comments were received from across the country.

The overwhelming majority of commenters supported wilderness being designated in the park, with most supporting more wilderness (alternative B) than in the preferred alternative (alternative C). The largest number of commenters (35% of the total), including the National Parks Conservation Association, Wilderness Society, and Chequamegon Audubon Society, supported the alternative C wilderness proposal with the addition of Basswood Island (except for the quarry and dock). Including Basswood Island would add another 4.5% of the park's land base into the wilderness proposal. These commenters believed that this revision would provide continued opportunities to interpret the island's cultural resources while providing permanent wilderness protection to the island. Another large group (33% of the total response), including the Izaak Walton League, PEER, and the Ecotopian Society, supported the

maximum wilderness proposal (alternative B). Many commenters, including the Bayfield Chamber of Commerce, supported the preferred alternative. A number of other commenters supported the preferred alternative with other modifications or conditions. The Sierra Club favored adding two-thirds of Sand Island and most of Basswood Island into the wilderness proposal. The town of Bayfield supported the preferred alternative with the condition that the National Park Service define water or access level to the islands so access is available at all times regardless of water level. A small group of commenters, including the governor of Wisconsin, favored the designation of wilderness but did not specify which alternative they favored.

A handful of commenters, including the town of Russell and Citizens Against Apostle Islands Wilderness, opposed wilderness, arguing that the park does not qualify as wilderness, that this would satisfy only a few elitists, and that current management without wilderness is working fine. A couple people also supported less wilderness being designated than in the preferred alternative.

Finally, a group of commenters wrote supporting the exclusion of Sand Island from the wilderness proposal.

Although written comments were not received from Bayfield County or the Voigt Intertribal Task Force, it is known that the Bayfield County Board approved a resolution opposing wilderness, and the Voigt Intertribal Task Force continues to have concerns related to the impacts wilderness might have on the exercise of their treaty-reserved hunting, fishing, and gathering rights. National Park Service

staff remain committed to finalizing an agreement with the affected tribes to define the scope of these rights in a mutually satisfactory manner, whether wilderness is ever designated in the Apostle Islands or not.

COMMENTS AND RESPONSES

This section includes all written comments from governmental agencies, organizations, and substantive written and oral comments from individuals. Because of the volume of written comments received, individuals with substantive comments that were identical or similar to comments from organizations, or whose comments were addressed in the responses to organizations, were not reproduced. The National Park Service's responses to all substantive comments are also included in this section. Some comments required text modifications, which have been made in the final EIS. These changes are identified in the NPS responses. All page number citations refer to the draft EIS.

Below is a list of the agencies, organizations, and individuals that are included in this document in the order that they appear. Page numbers are included after each commenters name.

Agencies

U.S. Environmental Protection
Agency 115
Hon. Jim Doyle, Governor, State of
Wisconsin 116
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Administration 117
Wisconsin Natural Resources Board 117

Town of Bayfield 119
Town of Russell 120

Organizations

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Waters Wilderness 128
Howard County Bird Club 134
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 09 2003

REPLY TO THE ATTENTION OF:

B-19J

Bob Krumenaker, Superintendent
Apostle Islands National Lakeshore
Rt. 1, Box 4
Bayfield, Wisconsin 54814
Attention: Wilderness Study

Subject: Comments on the Draft Environmental Impact Statement and Wilderness Study for the Apostle Islands National Lakeshore, Bayfield Area, Wisconsin

Dear Mr. Krumenaker:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) and Wilderness Study for the for the Apostle Islands National Lakeshore, Bayfield Area, Wisconsin. Our review and the comments that follow are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CEQ's number for this DEIS is 030314.

During the scoping process for this project, the public raised several major issues and concerns around the issue of wilderness designation. These concerns included:

- The impact of potential new developments on the islands;
- Changes in park access;
- Changes in visitor uses and experiences;
- Impacts to local communities and economies;
- Impacts on Native American treaty rights;
- Protection of cultural resources, and
- Changes in park operations.

The NPS analyzed three action alternatives (Alternatives B, C, and D) and a No Action alternative (A) in the DEIS. Alternative C is the Preferred Alternative and has also been chosen as the NPS's Environmentally Preferred Alternative. All three action alternatives designate most of the National Lakeshore as wilderness, with Alternative C designating 80% of the available land. Although Alternative B would capture more land in wilderness areas (94%), it lacks Alternative C's very appropriate emphasis on minor development for cultural and interpretive education for the visiting public.

Having reviewed the DEIS, U.S. EPA rates "C," the Preferred Alternative, **LO, Lack of Objections**. The LO rating indicates that we do not have concerns about the project impacts or the amount of information the NPS has supplied in support of their impact analysis. We appreciate the opportunity to review the DEIS. Please send only two copies of the final EIS to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please call Rosalyn Johnson at (312) 353-5692, or send email to johnson.rosalyn@epa.gov.

Sincerely,

Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosure: Summary of Rating Definitions and Followup Action



JIM DOYLE
GOVERNOR
STATE OF WISCONSIN

October 16, 2003

Superintendent Bob Krumenaker
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54891

Dear Superintendent Krumenaker:

I am writing to support the proposed wilderness designation for the Apostle Island National Lakeshore and encourage the Park Service and Congress to name the wilderness after former Wisconsin Governor and US Senator Gaylord Nelson.

The state of Wisconsin was instrumental in the establishment of the Apostle Islands National Lakeshore decades ago when we donated our significant land ownership on Oak, Stockton, Basswood and Michigan Islands to the National Park Service. When we transferred these lands, we passed legislation declaring our intention that these lands be protected to "ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity." The National Park Service and US Congress can fulfill this covenant by approving the pending wilderness proposal.

The Apostle Islands are a treasure for the people of Wisconsin and the nation and a critical cornerstone for tourism in northern Wisconsin. The 22 islands, 150 miles of shorelines, 70,000 acres of pristine beaches, remnant old growth forests, sea caves and wildlife provide for lifelong memories for visitors. Because of these attractions, visitors to the islands have increased 40 percent over the past ten years and continue to rise.

In order to preserve these islands for future generations to enjoy, there is broad support for proposals to designate significant portions of the Apostle Islands as wilderness. This designation will maintain the islands as they are, protecting current uses of the park such as campsites, boating access, docks, and lighthouses while ensuring that the wilderness on the Islands will remain there for our children and grandchildren.

Former Governor and U.S. Senator Gaylord Nelson, the founder of Earth Day, had the vision and demonstrated leadership in protecting the Apostle Island for the enjoyment of future generations. In 1970 the Apostle Islands became the Apostle Islands National Lakeshore and part of the National Park Service. Therefore, as an expression of Wisconsin's gratitude for the conservation

Superintendent Bob Krumenaker
Page 2

efforts and leadership of the founding father of the Apostle Islands, I strongly endorse naming the wilderness area after the honorable Gaylord Nelson.

Sincerely,



Jim Doyle
Governor

CC: Congressman David Obey
Senator Russell Feingold
Senator Herb Kohl



WISCONSIN DEPARTMENT OF
ADMINISTRATION

JIM DOYLE
GOVERNOR
MARC J. MAROTTA
SECRETARY
Division of Intergovernmental Relations
101 East Wilson Street, 4th Floor
Post Office Box 8944
Madison, WI 53708-8944
Voice (608) 266-0288
Fax (608) 267-6917 TTY (608) 267-9629

Direct Telephone: (608) 266-3687
E-mail: travis.olson@doa.state.wi.us

October 17, 2003

Jim Nepstad
Management Assistant
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

RE: Wilderness Suitability Study at Apostle Islands National Lakeshore

Dear Mr. Nepstad:

Thank you for consulting with us regarding the Wilderness Suitability Study underway at Apostle Islands National Lakeshore on Wisconsin's Lake Superior coast.

The Wisconsin Coastal Management Program (WCMP) was established in 1978 under the Federal Coastal Zone Management Act to protect and wisely use this valuable natural resource for present and future generations. The WCMP has the responsibility to review federal activities that may affect the coastal resources of the State under the federal consistency review process (section 307, CZMA). Thus the WCMP welcomes the opportunity to review the final Environmental Impact Statement for the Wilderness Suitability Study for the Apostle Islands.

The Wisconsin Coastal Management Council, which advises the WCMP on the development and implementation of coastal policies, supports the designation of areas of the Apostle Islands National Lakeshore as protected wilderness under the 1964 Wilderness Act. WCMP staff will continue to monitor the development of a Final Wilderness Study, which may be subject to the federal consistency review process.

Let me know if you would like to further discuss these issues. Thank you for your attention.

Sincerely

Travis Olson, Analyst
Wisconsin Coastal Management Program

cc. James Langdon, Division of Intergovernmental Relations
Bill Smith, DNR
Alberto Vargas, WCMP

coastal.wisconsin.gov

RESPONSE/MEMORANDUM

State of Wisconsin

DATE: September 11, 2003

TO: Natural Resources Board Members

FROM: Scott Hassett - Secretary

SUBJECT: Apostle Islands National Lakeshore Resolution

BACKGROUND. The Apostle Islands National Lakeshore was authorized by Congress in 1970, and consists of 21 of the 22 Apostle Islands located off Wisconsin's Bayfield Peninsula, as well as a narrow strip of land on the Peninsula itself. In 1975 the state of Wisconsin deeded lands that it owned on several of the islands to the National Park Service, with the proviso that the cession be contingent on the lands being managed in an undeveloped state. In the act authorizing the transfer, the legislature declared that "it is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character . . . (to) ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity."

Under the terms of the Wilderness Act the National Park Service was required to do a wilderness study of the Apostle Islands. The study was begun in 2001. In 2002 four wilderness/non-wilderness alternatives were developed and presented to the public in a series of public meetings. In July, 2003, the preferred alternative was published, and was presented to the public in another series of meetings. After analyzing the public comments, the Park Service will make its recommendations to Congress: only Congress can establish a unit of the National Wilderness Preservation system.

The Park Service preferred alternative would recommend permanent wilderness protection for most of the lands on 18 of the islands, totaling about 80% of the land acreage of the park. Lake Superior water areas would not be included in the wilderness, nor would the shoreline strip on the Bayfield Peninsula mainland. All major public use facilities — principally lighthouses and docks — are excluded. Long Island is excluded at the request of the Bad River Band of Chippewa; Sand Island is excluded because of scattered non-conforming structures and the desire to use the island for future historic and cultural interpretation; Basswood Island is excluded to provide for possible future non-wilderness development (e.g. a day use picnic area), and also possible historic and cultural interpretation.

Wilderness designation is an "overlay" on the park, forest, or refuge unit in which it is established. In general it prohibits motorized access, extractive commercial activity, and construction of buildings or other structures. Other activities, such as hunting, trapping, and fishing, continue to be governed by whatever laws and regulations applied to the property before the wilderness designation was established. Hunting, trapping, and fishing are permitted at the Apostle Islands and would not be affected by wilderness designation.

The National Park Service has managed nearly all of the lands on the Islands as wilderness since the creation of the Lakeshore. Since docks, developed campgrounds, and structures are excluded from the proposal, no existing use of the Lakeshore will be affected by the wilderness designation.



Public comments have generally been supportive of the wilderness designation, and no organized opposition has developed. Some boaters have questioned the proposal, as they would like to see additional docks created. Environmental groups have been generally supportive of the Park Service's proposal, but recommend the inclusion of Basswood Island in the proposed wilderness: they argue that the potential historic and cultural interpretation can be better accomplished on Sand Island (the exclusion of which they agree with,) and that Basswood's location close to the city of Bayfield makes it the most vulnerable island to inappropriate development pressures, and hence the most important to protect with wilderness designation. A "shared vision" alternative that would include Basswood Island has been developed. The NRB's proposed resolution does not favor either specific proposal over the other.

Gaylord A. Nelson was Governor of Wisconsin from 1959 to 1962, and US Senator from 1963 to 1980. As Governor he did much to establish the bi-partisan commitment to resource conservation and wise stewardship that has prevailed in Wisconsin for most of the years since then. As Senator he developed an international standing as a leader in conservation and environmental issues. Since leaving the Senate he has continued to be a tireless advocate for wilderness values as a spokesman for the Wilderness Society. Growing up in northwestern Wisconsin, Gaylord Nelson knew the Apostle Islands from his childhood on. Establishment of the Apostle Islands National Lakeshore was one of his two main goals when he first ran for the Senate, and he did not rest until it was accomplished. Naming of the wilderness is not a part of the National Park Service proposal but is permitted by National Park Service policies.

CC: Laurie Osterndorf - AD/5

STATE OF WISCONSIN NATURAL RESOURCES BOARD RESOLUTION

WHEREAS, since its establishment in 1970 the Apostle Islands National Lakeshore has been an outstanding natural resource available to the people of the state of Wisconsin, and

WHEREAS, in 1975 the Wisconsin legislature declared that "it is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character . . . (to) ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity," and

WHEREAS, the National Park Service has managed the great majority of the land within the National Lakeshore as wilderness, and has recently completed a study recommending that this management philosophy be made permanent by enacting statutory wilderness dedication for most of the Apostle Islands' land base, and

WHEREAS, former Wisconsin Governor and United States Senator Gaylord Nelson was directly responsible for the establishment of the Apostle Islands National Lakeshore, and has been for four decades one of the nation's leading advocates for protecting wilderness values throughout the United States, now therefore

NOW, THEREFORE, BE IT RESOLVED, that the Wisconsin Natural Resources Board recommends to the United States Congress that it pass legislation to enact wilderness status for the Apostle Islands National Lakeshore, excluding those lands currently managed for non-wilderness uses and one or more sites of historical and cultural significance where future interpretation would be significantly hindered by wilderness designation, and

BE IT FURTHER RESOLVED, that the Wisconsin Natural Resources Board recommends that the unit of the National Wilderness Preservation System created within the Apostle Islands National Lakeshore be named the Gaylord Nelson Wilderness.

Approved on this 24th day of September 2003 by the Natural Resources Board at its meeting in Boulder Junction, Wisconsin.

NATURAL RESOURCES BOARD

Trygve A. Solberg
Chairman

TOWN OF BAYFIELD

City, Trunk J • P.O. Box 1126
Bayfield, WI 54814

October 14, 2003

Bob Krumenaker
Superintendent, Apostle Islands National Lakeshore
Rt. 1 Box 4
Bayfield, Wis. 54814

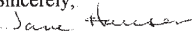
Dear Superintendent Krumenaker:

On Monday, October 13, the Town of Bayfield held an information session on the proposed designation of the AINL to Wilderness. We thank you for your time and the information that you presented.

1.

The Town Board goes on record supporting the wilderness designation, alternate C on the condition the NPS can define water or access level to the Islands so access is available at all time regardless of the water level. The vote was three affirmative and two against.

Thank you again for your time.

Sincerely,

Town of Bayfield
Board of Supervisors
Jane Hauser, Clerk

Response to Town of Bayfield

1. The waters and submerged lands of Lake Superior up to the high-water mark were determined to not be suitable for wilderness. This exclusion covered all existing beaches and public docks on the islands. If lake levels were to change, either raising or dropping, the high-water mark would change, as would the wilderness boundary, which would always be above the lake. Regardless of the water level, beaches and public docks would continue to be outside the wilderness boundary, ensuring access to the islands. See also the new text box on the wilderness boundary and Lake Superior in the "Alternatives" chapter in this document.

Town of Russell
35900 State Highway 13
Bayfield, Wisconsin 54814
(715) 779-5338 or Fax (715) 779-0249
townofrussell@centurytel.net

Paul Tribovich
Chair

Dave Good
Clerk/Treasurer

September 15, 2003

Robert Krumenaker, Superintendent
Apostle Islands National Lakeshore
Attn: Wilderness Study
Route 1 Box 4
Bayfield, WI 54814

Dear Superintendent Krumenaker:

RE: OPPOSED TO WILDERNESS DESIGNATION

The Town of Russell Board of Supervisors is opposed to designating the majority of the Islands in the National Park as wilderness. This action was taken following our discussion at a Regular Monthly Board Meeting on September 9, 2003.

The Board has taken this position in opposition to the wilderness classification for the following reasons:

1.

1. The islands are not untouched by man and in a primitive state warranting "wilderness" designation. Most islands have extensive man made impacts such as quarries, logging roads, old railroad grades, logging camps, no first growth forests, and other significant human impacts.
2. The current method of managing the park without the "wilderness" designation is working just fine. The resource is being protected and preserved.
3. Access to the islands is almost entirely by motorized vehicle (boat, ATV, snowmobile). Traveling to the island via these conveyances creates noise and doesn't fit with the concept of "wilderness". People have a concept that "wilderness" is supposed to take you away from these mechanized machines. Why mislead them in thinking they are in a "wilderness" when boats, planes, snowmobiles, etc. can cruise the shorelines and Lake Superior without restriction.
4. Most islands have some structures on them. These can range from lighthouses, docks, NPS structures and developments such as campgrounds. The idea that you can carve these areas out of the "wilderness" designation and several hundred feet away it is a "wilderness" is a rather stupid concept.
5. The ability to offer the public a "wilderness" experience is important. We do not believe this small park, dispersed within Lake Superior which is a means of public

transportation for commercial cargo and sight seeing vessels and commercial fishing realistically affords a "wilderness" experience to a visitor.

2.

6. Any where a person would go within the islands, they will hear planes and boat motors. Visually they will see sail boats, lighthouses, fishing vessels, fishing boats, charter boats, etc. Does this make sense in a "wilderness"?

These are just a few of the reasons we think the park should NOT BE DESIGNATED A WILDERNESS and management of the resource should continue as it has since the park was established.

Sincerely:



Paul "Rocky" Tribovich, Chairman
TOWN OF RUSSELL BOARD OF SUPERVISORS

cc: Governor Jim Doyle

Response to Town of Russell

1. As noted on p.10, an area does not need to be untouched by people to be considered for wilderness designation. See also response 3 to Citizens Against Apostle Islands Wilderness and response 1 to the Isaak Walton league.
2. It is not true that anywhere one goes within the islands one would hear planes and boat motors: in the interiors of many of the islands, motor sounds would rarely be heard. While it is true that on the shoreline of the islands one would more likely hear motor sounds and see boats, this is true on the boundary of many wilderness areas, where people arrive by vehicles. It also should be noted that NPS wilderness guidelines state that external influences are not to be considered in evaluating wilderness suitability: "The term "wilderness character" applies only to the immediate land involved, not to influences upon it from outside areas." See also the above responses.



ASHLAND-BAYFIELD COUNTY
**THE LEAGUE
OF WOMEN VOTERS**
ASHLAND, WISCONSIN 54806

10/7/03

Bob Krumenaker
Superintendent
Apostle Islands National Lakeshore
Rt. 1 Box 4
Bayfield, WI 54814

Dear Superintendent Krumenaker,

The Ashland/Bayfield County League of Women Voters writes to voice support for the "Preferred Alternative Plan" being submitted as part of the application for Wilderness designation. This support comes as a consensus vote of the membership. Our local LWVs represents approximately 100 Wisconsin Citizens living near to the Apostle Islands.

We based our decision after review of Position Statements from the LWVUS and application of these standards to the proposed alternatives. The "Preferred Alternative Plan" is the best fit with the LWV Positions. The Positions have been reached in a well-honored tradition in which the League members study issues and then after due deliberation, reach consensus. The Positions Statements therefore represent the opinions of thousand of United States citizens.

Specifically, The LWVUS Position on Natural Resources states:

"The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability...

To assure the future availability of essential resources, government policies must promote stewardship of natural resources....

The League supports comprehensive long-range planning and believes that wise decision making requires...

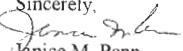
-special responsibility by each level of government for those lands and resources entrusted to them;...

-special consideration for the protection of areas of critical environmental concern, natural hazard, historical importance and aesthetic value."

The ABC/LWV believes the Apostle Island National Lakeshore is a unique historical and aesthetic ecosystem. As such it deserves to be maintained in large part as wilderness, as described in the Preferred Alternative Plan.

Thank you for considering our comments in this matter.

Sincerely,


Janice M. Penn
President-ABC/LWV
Rt. 1 Box 267
Highbridge, WI 54846



"Always In Season"

P.O. Box 138
42 South Broad Street
Bayfield, Wisconsin 54814
715-779-3335
fax: 715-779-5080
1-800-447-4094
www.bayfield.org

September 22, 2003

Bob Krumenaker, Superintendent
Apostle Islands National Lakeshore
Rt. 1, Box 4
Bayfield WI 54814

Dear Superintendent Krumenaker:

The Bayfield Chamber of Commerce is pleased to inform you that a resolution was passed at the Board of Director's October meeting endorsing the designation of the Apostle Islands as wilderness as outlined in Alternative C of the Draft Wilderness Study and Environmental Impact Statement..

Specifically, the following resolution was unanimously passed:

"RESOLVED THAT the Board of Directors of the Bayfield Chamber of Commerce recognizes the importance of the Apostle Islands National Lakeshore to the residents, visitors, and future generations of the Bayfield area for its natural beauty, environmental value, recreational value, historical importance, and tourism-related economic impact on the area.

"To ensure that the integrity of the Apostle Islands National Lakeshore is protected for generations to come, the Bayfield Chamber of Commerce Board of Directors goes on record in support of the National Park Service recommendation of implementing Alternative C of the Draft Wilderness Study and Environmental Impact Statement, which proposes designating approximately 80% of the Apostle Islands National Lakeshore as protected wilderness. The Chamber Board also encourages the Park Service to give due consideration to the "Shared Vision" proposal from the Friends of the Apostle Islands National Lakeshore before making its final recommendation to Congress."

Sincerely,

Tom Fabjance, President

Al Chechik, Vice President

Eric Carlson, Secretary

Jack Began, Treasurer

Nancy Bussey

Mary Grant

John Thiel

Jim Hauser

Kathleen Russell

Cc: Senators David Obey and Russell Feingold

CHEQUAMEGON DEMOCRATIC PARTY
(Ashland and Bayfield Counties, WI)
c/o James A. Collins, Chair
22935 Missionary Point Drive
Cable, WI 54821

August 27, 2003

Mr. John Neal, Superintendent
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

Re: Wilderness Designation for Apostle Islands National
Lakeshore

Dear Mr. Neal:

The Chequamegon Democratic Party (Ashland/Bayfield Counties, WI) supports permanent wilderness status for the Apostle Islands National Lakeshore. At our July 24, 2003 meeting, we passed a resolution supporting the permanent wilderness designation (Preferred Alternative C in the Park Service Wilderness Study). We are a 120 member organization whose members and families enjoy the wilderness and wish to preserve and protect it for current and future generations.

Very truly yours,

James A. Collins
James A. Collins, Chair
Chequamegon Democratic Party

Jac/deg



October 14, 2003

Apostle Islands National Lakeshore
Wilderness Study Coordinator
National Park Service
Route 1, Box 4
Bayfield, WI 54814

Dear Wilderness Study Coordinator Nepstad,

The Chequamegon Audubon Society is the chapter of the National Audubon Society located in the part of Northwestern Wisconsin that includes Apostle Islands National Lakeshore. We have a membership of about 100 individuals who are supporters of wilderness and the national parks. We appreciate the opportunity to comment on Apostle Islands National Lakeshore's Draft Wilderness Study. We strongly support the designation of a wilderness area within the park's boundaries, and are pleased that the National Park Service supports the idea of permanent protection for this unique national park's rich array of natural and cultural resources. Although most of the islands are already managed as a wilderness area under the park's General Management Plan, a formal wilderness designation would offer permanent, legal protection, and would preserve its wilderness character for generations to come.

The park's preferred alternative (alternative C) for wilderness designation would extend wilderness protection to about 80% of the land area of the park. Chequamegon Audubon supports this proposal, but would also support proposals that would include designating most of Basswood Island as wilderness. Excluding the dock area and the area around the historic brownstone quarries from wilderness designation would provide opportunities to interpret the island's cultural resources for visitors, but would protect the wilderness character of the rest of the island.

Opportunities to offer wilderness protection to our public lands are becoming increasingly rare, and we commend the park's staff for their work in support of wilderness designation in the national lakeshore. We also support Wisconsin Gov. Jim Doyle's proposal to name the wilderness the "Gaylord Nelson Apostle Islands

Wilderness Area" in honor of the man most responsible for protecting this remarkable corner of the state.

Thanks you for this opportunity to comment.

Sincerely,

Leon Solberg *Sam Atkins*
Cory MacNulty *Nail Hawk*
Chequamegon Audubon Society Board of Directors

Leon Solberg
Sam Atkins
Cory MacNulty
Nail Hawk

Citizens Against Apostle Islands Wilderness
PO Box 206
Ashland, WI 54806

The National Park Service is intent on its mission to convert the Apostle Islands National Lakeshore into a wilderness area. I would like to go on record, not only for myself but hundreds of others, in opposing this plan. The reasons are numerous and varied and will be addressed as completely as possible.

But first a comment expressed in a Duluth Tribune article by Bob Krumenaker, Apostle Islands superintendent, must be examined. He stated that, and I quote, "So far, no organized opposition has mounted." That is true, but only because the backers of this proposal are well funded special interest groups, whereas the public does not have a group or professional organization through which to voice their concerns. Please be advised that those of us in opposition, are in the process of trying to get organized.

Back in 1970 when the Lakeshore was established, one of the selling points the special interest groups and the Park Service used to convince many people, was the fact that according to Title 16, Sec. 460w, one of the prime functions of the NPS was to develop the islands for the recreational use of the public. To that end, the federal government has invested millions of dollars in local facilities, such as the Ashland Marina, to encourage the use of the islands. Now, the NPS wants to change the mission.

It must also be pointed out, that in the original plans, Long Island was not included in the park because of its location. Because of a bird, the government decided it must manage that island also, against the promises made only a few years prior. Now the NPS wants to change its major objective.

In addition, we the taxpayers of Bayfield and Ashland counties have had to assume an additional financial burden, because of the removal of thousands of acres from our tax rolls. Monies we are still paying.

The fear of creating a wilderness area in the Apostle Islands has many foundations.

1.
 1. Take for instance the errors that were made at the Isle Royale National Park. After making the same promises that are being made about the Apostle Islands, the NPS decided to remove many of the docks and alter trail access. In a court case challenging this effort, Circuit Judge Karen Nelson Moore, opined that it is within the discretion granted by the Wilderness Act and the National Park Service's Organic Act that the NPS could do as it wishes. Now we are being asked to believe the same promises as were put forth at Isle Royale.

Responses to Citizens Against Apostle Islands Wilderness

1. The situation with Isle Royale National Park docks and Apostle Islands National Lakeshore docks is different, and the two cannot be compared in this manner. Wilderness was designated at Isle Royale in 1976, with very few land areas excluded from the wilderness designation. Many of the docks at Isle Royale are immediately adjacent to wilderness; one steps directly from these docks into wilderness. The close proximity of docks to wilderness, and the fact that some of these same sites are also major backpacking trailheads and canoe portages, has contributed to conflict among various Isle Royale users. This conflict is one of the major reasons that the recent *General Management Plan* for Isle Royale proposes to remove docks from some locations at Isle Royale and place them elsewhere in the national park. (That plan would actually result in a net increase in docks within Isle Royale National Park.) In all of the Apostle Islands wilderness alternatives, the land adjoining each public dock is purposely kept out of wilderness. In further contrast to Isle Royale, none of the Apostle Islands docks serve as major congregating points for backpackers, canoeists, or even kayakers. We believe that the different geography and the deliberate decisions on wilderness boundaries will minimize or avoid entirely the kind and magnitude of user conflicts that led to the dock relocation proposals at Isle Royale. By carefully listening to the concerns expressed by Isle Royale boaters, we believe we have incorporated safeguards into all of the wilderness alternatives to prevent the need for similar actions in the Apostle Islands. Thus, no public docks in Apostle Islands National Lakeshore would be removed as a direct or indirect result of wilderness designation.

2. 2. It should be noted the NPS has already removed or plan to remove a series of docks, i.e., Bear Island, Bass Island and South Twin. It is also planning to remove picnic tables.
3. No matter what propaganda is being presented, there are rules governing how the NPS shall conduct its operations under the Wilderness Act. The Wilderness Act specifically prohibits certain uses and developments, such as motorized equipment (another way of saying boats with motors) picnic tables, interpretive signs and trails and waysides, and other forms of mechanical transport (e.g. bicycles). Mr. Krumenaker and others can say publicly that no drastic changes will be made, but that is pure hogwash. They are governed by existing laws.
4. There are hundreds of laws, regulations and court decisions that protect the public's lands and resources, whether or not they are designated as wilderness or not. So, when you hear someone claim that an area must be designated legal wilderness to protect it from destruction, understand that they are either ignorant or they are attempting to deceive you.
5. The Apostle Islands, even without the NPS have the finest protector of their future, of any park. That protector is Mother Nature and the waters of Lake Superior. Combine the bugs, mosquitoes, wildness, and the possible violent nature of Lake Superior and you have a triple threat against too much use.
3. 6. The NPS has taken a very loose definition of land suitable for wilderness under Management Policies 2001. One criteria is that the earth and its community of life are untrammelled by man. Don't the quarries on Bass and Stockton, the railroad track on Outer, the various docks and cottages that were located in the islands, the logging that went on, the construction of Lighthouses, and etc. qualify as trammelled? Another criteria is the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. It doesn't take an Einstein to figure out that boaters are not primitive.
7. The NPS has already made a number of mistakes in the Apostle Islands. The construction of a non-usable dock on Michigan Island, and the razing of the Nourse's fish camp and fish boil facility on Rocky Island only to replace it with a structure that is modern and intrusive are examples.

2. No public docks are planned for removal from the islands you cited. An unusable, unsafe dock was removed from South Twin Island for safety reasons in 2003. The dock at the north end of Basswood Island was taken out by a storm and not replaced many years ago. No public docks have ever existed or been removed from Bear Island. Picnic tables would only be removed from a small number of campsites if wilderness is designated in the park.
3. The criterion you cited is not the only criterion used to determine if an area is suitable for wilderness. As noted on p. 10, another criterion is that the area "...generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." NPS Management Policies 2001 also state that "Lands that have been logged, farmed, grazed, mined... may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions." Many existing designated wilderness areas, such as in Shenandoah National Park, were substantially altered by people but subsequently recovered to a more "natural" condition and were designated as wilderness. In both the Wilderness Act and the Eastern Wilderness Act, Congress recognized that areas that had been altered by people could still be considered for wilderness designation. In addition, you should be aware that many of the developments you mentioned (i.e., the light stations, docks, quarries on Basswood and Stockton Islands) are not being proposed for wilderness designation. And boaters on the water are also outside the areas being proposed for wilderness designation. See also response 1 to the Izaak Walton League.

4. 8. The National Park Service has issued user figures, citing 200,000 visit the park each year; 75,000 get to the islands by boat, with 29,000 of those 75,000 using the tour boats. That leaves 46,000 visiting the islands by private boats. Baloney! How that 46,000 figure is reached is that every island with a ranger counts every boat that goes by the island as not only visiting the island, but containing four people. When I took a fishing trip to the West side of Sand Island with only two people on board, I went by four islands with rangers. Hence, since I also went by four islands with rangers on the way back, I was counted as 32 people who visited the islands. Yet, I never stopped at an island. I wonder how the count escalates when a sailboat race goes through the islands. If an agency is going to release figures, they should be accurate.

5. 9. Ashland and Bayfield counties are economically depressed, with little industry and jobs scarce. The major industry is tourism and any effort that may impede the development or continuation of tourism should be regarded as highly suspect. Designating the Islands as a wilderness leaves open the possibility that the enactment of the Wilderness Act could curtail or ruin this industry. Why take the chance?

I would like to quote Congressman Chris Cannon of Utah, "The tradeoffs that accompany wilderness designation can hurt other resource values. Legal wilderness is simply a land management scheme to promote a certain recreational preference. Choosing this option entails tradeoffs, some of which promote certain resource values at the expense of other resource values. The only way to say that legal wilderness is "better" than other land management options is to first decide that the resource values which are thereby promoted are "better" than the values which are damaged by legal wilderness. The REAL ISSUE in the debate over legal wilderness designation is choosing which resource values to promote over others."

In summing up our opposition to the wilderness designation, I would like to quote Superintendent Krumenaker, when asked what the islands would be like 50 years from now if the wilderness designation doesn't go through. He replied, "There probably wouldn't be any change, except that maybe the boaters would force us to build a facility such as that on Stockton Island." In other words, the islands are to be for a select group, not for everybody.

There is an old quotation that says, "If it ain't broke, don't fix it." The islands are not broken, so let's not make any changes that our children may deeply regret.

Dave Sorenson

4. In fact, the text on p.60 stated slightly different figures for 2001 than the numbers you cited. A total of 48,000 visitors were estimated to access the islands via private boats. This number was primarily based on the number of boats anchored off the islands at night or the number of visitors encountered by NPS employees on the islands. Boats passing islands are not counted in the park's visitor figures.

5. We do not believe there is any evidence to indicate that wilderness designation would adversely affect the local tourism industry, as noted in the text on pages 19-20. Indeed, the City of Bayfield and the Bayfield Chamber of Commerce passed resolutions in support of wilderness in the Apostle Islands.

Dave Searles
Founder and President

THE ECOTOPIAN SOCIETY

607 E. 2nd Avenue
Brodhead, WI 53520-1114

608-897-2368
ecotopian@wekz.net

The Ecotopian Society is an environmental and progressive philosophical and political network. It is dedicated to preserving and protecting the environment and our national heritage. Ecotopian political philosophy is a combination of Environmentalism, Jeffersonianism and Progressivism. Ecotopians were Democrats but first the Democratic National Committee sold out to the rich, big business and corporate America and then some of our most trusted elected Democratic leadership abandoned us. We now strive to create and build a new political party, the Ecotopian Party, that will truly protect the environment and represent the people.

Protect the Apostle Islands

I am fully behind the National Park Service's efforts to permanently protect parts of the Apostle Islands National Lakeshore from any future development by designating them Wilderness Areas while maintaining historic and cultural aspects on them.

The Apostle Islands is home to one of the greatest concentrations of black bears in North America and geologic wonders including carved arches, intricate sea caves, and dramatic red sandstone bluffs. The primitive character of these islands must be preserved to protect this unique habitat and for the enjoyment of future generations.

The Wisconsin state legislature entrusted these islands to the Park Service on the condition that their wilderness character be preserved. The Park Service has an obligation to protect the maximum number of acres as Wilderness Areas. It has already had a great start - I understand that much of this area has been managed as wilderness since 1989, following a study which concluded over 97% of the lands in the Apostle Islands are suitable for wilderness designation.

Therefore, I call on you to designate the maximum amount of land possible as wilderness areas while keeping in mind that making them wilderness areas does not mean we must remove all traces of past human activity.

Thank you for taking the time to read and to consider this matter.

Sincerely,

Dave Searles

M.A., History, Washington College, MD, 1992
B.A., Milton College, WI, History-Political Science major and minors in Criminal Justice and Natural Resources



October 13, 2003

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, Wisconsin 54814

Dear Wilderness Study Coordinator:

On behalf of the Board of Directors and staff of the Friends of the Boundary Waters Wilderness ("Friends"), please accept the following comments regarding the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. We appreciate the opportunity to share our concerns, comments and recommendations with you. Please make our comments part of the official record.

The Friends is a non-profit wilderness conservation organization with about 3,000 members from across the country. The mission of the Friends of the Boundary Waters Wilderness is *to protect, preserve and restore the wilderness character of the Boundary Waters Canoe Area Wilderness (BWCAN) and the Quetico-Superior Ecosystem.*

Staff members visited the Apostle Islands National Lakeshore for two days in July 2003 and attended open houses hosted by the National Park Service (NPS). We appreciate the time and effort taken by NPS staff members to present information and answer our questions.

Many Friends members and residents from Minnesota and throughout the upper Midwest visit the Apostle Islands National Lakeshore. Protecting the Apostle Islands is important to achieving a region of wild interconnected areas across northern Minnesota, Wisconsin and Michigan. Such efforts are important to the long-term health and protection of the Boundary Waters Canoe Area Wilderness.

I. EXECUTIVE SUMMARY

The Friends endorses a modified Alternative C, which designates most islands in the park as wilderness. Our proposed change is to designate Basswood Island as wilderness, with the exception of the dock on the west side of the island and a quarry on the southern tip of the island. These exclusions are consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways, all public docks on the islands, and major cultural sites such as the six light stations and numerous historic residences and structures.

The Friends of the Boundary Waters Wilderness also offers the following comments and recommendations:

- A. The Friends strongly opposes the addition of "limited facilities" and "additional visitor developments" relating to the cultural resources on Basswood, Sand, Rocky, and Stockton Islands, as noted in Alternative C.
- B. The Friends urges the National Park Service to make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore's suitability for wilderness – not based on the NPS's plans for future development.
- C. Discussion regarding future development should be part of the Park's management plan – not part of the draft wilderness study. We would like to see a detailed explanation, in the Park's management plan, why the National Park Service believes that additional facilities might be needed given the extensive current system of visitor facilities.
- D. The National Park Service must ensure that the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island is protected given that *"sandscape vegetation is ... very sensitive to human trampling."*
- E. The National Park Service must address ways in which it will protect the bear population from the encroachment of humans on both Stockton and Sand Islands.
- F. The National Park Service must ensure the continuing protection of piping plovers' habitat. We request that the final Wilderness Study include a discussion of how the Park Service will comply with its legal responsibility to not adversely modify or destroy critical habitat when Long Island changes from *de facto* wilderness to non-wilderness.

II. OVERVIEW

The Apostle Islands National Lakeshore lies at the northern tip of Wisconsin as it juts into Lake Superior. The 21 islands (Madeline Island is the only island not included in the National Lakeshore) range in size from three acres (Gull Island) to 10,054 acres (Stockton Island), and each of them is unique. There are old-growth forests; high hills and steep valleys; red sandstone bluffs and intricate sea caves; and one of the greatest concentrations of black bears in North America.

While the surrounding waterways (not slated to be designated as wilderness) provide recreational opportunities for a variety of boats (kayaks, motorboats, and sailboats), the interiors of most of the islands remain remote and primitive and their characteristics are consistent with the tenets of the Wilderness Act: *"... an area where the earth and its community are untrammelled by man, where man himself is a visitor who does not remain..."* [16 U.S.C. § 1131 (c)].

III. COMMENTS ON PREFERRED ALTERNATIVE C

1.

A. Inclusion of Basswood Island as Wilderness

The Friends endorses a modified Alternative C, which designates most islands in the park as wilderness. **The Friends urges the National Park Service to designate the 1,917 acre Basswood Island as wilderness, with the exception of the public dock and the quarry at the southern tip of the island.** These exclusions are consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways, all public docks on the islands, and major cultural sites such as the six light stations and numerous historic residences and structures.

Friends staff spent four hours walking along Basswood's shoreline and interior, and strongly believes that this heavily-forested island deserves wilderness protection. The island's shoreline and interior were remote, quiet, wild, and exhibited "... *outstanding opportunities for solitude or a primitive and unconfined type of recreation.*" [National Park Service's Wilderness Preservation and Management Policies, 6.2.1.1.].

Aside from a few small clearings, as a result of early farming, the dense forest of red oak, sugar maple, quaking aspen, white and yellow birch, eastern hemlock, balsam fir, white cedar, red and white pine, and a few basswood trees provides a true wilderness experience. Red squirrels are common; there are whitetailed deer; and the island's diverse habitat attracts many of the 100 plus bird species that nest in the Apostles, including bald eagles. [www.nps.gov/apis/htm]

While there is evidence, to the trained eye, of the McCloud-Brigham Farm and the Rudd Farm, an old logging camp, and two quarries on the island, these sites are not incompatible with wilderness. According to the National Park Service's Wilderness Preservation and Management Policies: "*Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.*" [National Park Service's Wilderness Preservation and Management Policies, 6.2.1.2.].

For example, the McCloud-Brigham Farm, founded in 1865 and farmed until 1923, was the first homestead in the Apostle Islands. Today, there are remains of old buildings and stone walls that have all but been obliterated by the forces of nature. The remnants of this farm, along with the logging camp and quarries, enhance the visitor experience as they speak eloquently to a rich human history *and* the resilient power of nature. And, it is just that power Congress sought to preserve when it passed the Wilderness Act of 1964. It should be noted that Congress occasionally has included historic evidence within wilderness designations. While not common, old mining shacks and herders' shelters can be found in several wilderness areas in the western United States.

Responses to Friends of the Boundary Waters Wilderness

1. While we agree that Basswood Island is suitable for wilderness designation, we believe there are other justifiable reasons for not including the island in the NPS wilderness proposal. See response 1 to the National Parks Conservation Association and response 2 to PEER.

2.

B. Opposition to Future Development

The Friends strongly opposes the addition of “limited facilities” and “additional visitor developments” relating to the cultural resources on Basswood, Sand, Rocky, Stockton Islands as noted in Alternative C. The draft study states that “*they [Basswood and Sand] are ideally suited for the expansion of interpretive opportunities, such as some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands.*” [Draft, page 33]. Furthermore, the study states that the former fishing community on Rocky Island “*... keeps open the possibility of providing additional visitor developments to accommodate increased use in one of the park’s most popular areas.*” [Draft, page 34]. And finally, the study states that on Stockton Island, the new boundary would “*... keep open the possibility of providing additional visitor developments to accommodate increased use in the immediate vicinity of these popular areas.*” [Draft, page 34].

Interpretive opportunities and increased visitor use are not compelling reasons for additional facilities or developments. As outlined below (see V), the Friends believes there are others ways in which to interpret the rich cultural history of the islands other than building structures and erecting signage.

Furthermore, the Friends strongly discounts the argument that a possible increase of visitors to the Apostle Islands warrants additional visitor developments. The Apostle Islands National Lakeshore currently provides the following to its 195,000 annual visitors: a visitor center in the old courthouse building in Bayfield; a visitor center at Little Sand Bay; a visitor center on Stockton Island; six light stations, all of which are major visitor attractions; and the Manitou Island Fish Camp.

3.

C. Concerns on Decision-Making Process

The Friends urges the National Park Service to make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore’s suitability for wilderness – not based on the NPS’s plans for future development. Specifically, we are concerned that in Alternative C, “some areas were excluded because of the potential for expanding visitor facilities.” [Draft, page 33]. Determining an area’s suitability for wilderness designation should not be based on the need for more development

2. Comment noted. We disagree that interpretive opportunities and increased visitor use are not valid reasons for additional developments. While we agree that there are other interpretive techniques than building signs and structures to interpret cultural history, interpretive trails with signs and on-site structures like waysides communicate information in different ways than brochures and distant signs, and may be more effective in communicating with visitors, depending on the situation. Additional facilities, such as restrooms and visitor contact stations, may be warranted to meet the needs of increasing numbers of visitors and/or to help avoid or mitigate impacts to resources. Changes in user populations also may require new developments. This is not to say that we would (or could) provide new facilities in all of these situations. But we believe it is important to retain the flexibility, with appropriate public input and environmental compliance, to provide such facilities on a small number of the islands in the future. See also responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, and responses 1, 4, and 7 to Brandt Mannchen.

3. Our decision in selecting alternative C as the preferred alternative was not based on plans for future development. No such plans exist. We selected alternative C as our wilderness proposal, as noted on p.33, because we believe it provides excellent protection for the park's natural, cultural, and wilderness resources, it retains flexibility to provide outstanding interpretive opportunities for visitors, and it minimizes the number of small, fragmented areas of wilderness or nonwilderness. See also response 2 to PEER.

4.

IV. COMMENTS ON FUTURE DEVELOPMENT IN GENERAL

We are alarmed by the numerous references throughout the Draft Study that refer to future developments at a time when *"lack of adequate funding for preventative maintenance and investment projects has accelerated the deterioration of aging park assets and historic structures, and multiplied the cost of maintaining these facilities"* [Apostle Islands National Lakeshore Business Plan, page 10]. In fact, according to the Apostle Islands National Lakeshore Business Plan, the park operated in 2001 with an *"...almost \$3.5 million operational shortfall."* [Apostle Islands National Lakeshore Business Plan, page 3].

Discussion regarding future development should be part of the Park's management plan – not part of the draft wilderness study. We would like to see a detailed explanation, in the Park's management plan, why the National Park Service believes that additional facilities might be needed given the extensive current system of visitor facilities. We specifically question this need because "as of September 30, 2001, 85% of park visitors surveyed indicated satisfaction with appropriate park facilities, services and recreational opportunities." [Apostle Islands National Lakeshore Business Plan, page 12].

5.

V. COMMENTS ON CULTURAL RESOURCES AND INTERPRETATION

The Friends acknowledges that there is visitor interest in the history and cultural importance of the major cultural sites, such as Manitou Fish Camp and the six light stations. **The Friends urges the National Park Service to consider a myriad of other ways in which to disseminate information on these cultural resources other than future development.** For example:

- 1) Create "discovery site" pamphlets that would provide background information on these areas and allow visitors to "discover" the sites on their own rather than via interpretive signs, markers, or new structures.
- 2) Encourage Eastern National, a nonprofit that supports the park's visitor services and research programs, to publish additional books, maps and other publications focused specifically on the cultural resources
- 3) Maximize the use of employees and volunteers stationed at the light stations and Manitou Fish Camp and educate them about other cultural resources within the park so that as they talk about their specific site, they can also share information about the numerous other cultural sites around the islands
- 4) Use the existing three visitor centers and light stations and develop additional displays and videos that focus on the cultural resources.

Again, the Friends believes that the historical significance of past human activity on these islands should not be overlooked as it provides a rare opportunity to examine the interaction between humans and nature. Humans have been on the Apostle Islands for hundreds of years, and today, the islands show many signs of human activity. Since the mid 1600s, fur trading, quarrying, farming, logging, and fishing have occurred. Today, there are reminders of these activities such as at the Manitou Fish Camp and quarry pits on Stockton, Hermit, and Basswood Islands.

The Apostles are a unique blend of cultural history and natural forces, and these values are worth protecting. The last "improvement" they need is additional man-made facilities.

4. We agree that the question of whether or not future development is needed in the park should be addressed in the future general management plan. The only reason developments are discussed in this wilderness study is to examine potential impacts of designating or not designating wilderness. See also responses 1, 2, and 4 to PEER, and response 1 to Brandt Mannchen.

5. See response 2 above and response 1 to Brandt Mannchen.

V. COMMENTS ON NATURAL RESOURCES

The Apostle Islands are a product of more than one million years of the *forces of nature*. Wind, waves and ice have carved distinctive arches, extensive sea caves, and honeycomb cliffs into the shorelines of these islands. There are miles of sandscapes, including beaches, sand spits, cusped forelands, tombolos and a barrier spit (Long Island, southwest of Madeline, is an example of a barrier spit). These unique sandscapes are constantly changing due to a variety of natural forces, and each of them supports a variety of ecologically-important plants and animals.

In addition, several of the islands boast old-growth forests, towering reminders of what was once found across all of northern Wisconsin. For example, on Sand and Outer Islands, large white pine and hemlock dominate the reserve areas.

Finally, the forces of nature have created remarkable conditions that allow plants and wildlife to survive and thrive. For example, Stockton Island boasts one of the greatest concentrations of black bears in North America, and they regularly inhabit Sand and Oak Islands as well.

In addition, there are more than 100 species of birds (including the bald eagle), 800 species of plants (one federally listed and 37 listed as rare in Wisconsin, and over 200 species of mushrooms on Raspberry Island alone), and 35 different mammals. By establishing the Islands as a wilderness area, we are able to protect and restore the ecological health of these islands for the benefit of both its natural and human communities.

We do have some comments and concerns regarding natural resources in the non-wilderness areas in Alternative C.

6. a. Concern and Question regarding the tombolo on Stockton Island

While we concur with the reduction of non-wilderness lands on Stockton identified in Alternative C and excluding Presque Isle from wilderness designation given the large number of administrative and housing units in the area, we are concerned about the ongoing protection of the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island. Throughout the Draft Wilderness Study, there are repeated statements regarding potential development on the non-wilderness portions of the islands and specific to Stockton, comments such as “... *keep[ing] open the possibility of providing additional visitor developments to accommodate increased recreational use in the immediate vicinity of these popular areas.*” [Draft, page 34].

Sandscapes are vulnerable to invasions of exotic species, especially where native vegetation has been affected by human disturbance [Draft, page 53]. This would be exacerbated if the National Park Service builds additional facilities on Presque Isle. In addition, sandscapes are sensitive to disturbances such as fire and storms as well as repeated human traffic that can cause the sandcape to revert to barren sand [<http://www.nps.gov/apis/sandscap.htm>]. **The National Park Service must ensure that this unique, biologically-important sandcape is not destroyed given that “sandcape vegetation is ... very sensitive to human trampling.”** [Draft, page 53].

6. We agree that the tombolo on Stockton Island needs to be protected. As noted above, although the study generally evaluated the impacts of potential developments to fulfill the requirements of the National Environmental Policy Act, no new visitor developments are actually being considered or proposed on any of the islands. Protection of the park's sandcape features, like the Stockton Island tombolo, and the need for new developments are more appropriately addressed in future management plans, such as the general management plan.

7. **b. Concern for and comment on black bears on Stockton and Sand islands**

Stockton Island boasts one of the greatest concentrations of black bears in North America, and "*Stockton and Sand are the only islands with a known reproducing black bear population*" [Draft, page 54]. While we concur with the reduction of non-wilderness lands on Stockton and the exclusion of Sand Island from wilderness, we are concerned about the potential increased human activity on both of these islands caused by possible new developments. **The National Park Service must address ways in which it will protect the bear population from the encroachment of humans.**

8. **c. Concern for and comment on birds**

The Apostle Islands boast more than 100 species of birds, and the islands serve as an important migratory flyway stopover in the Great Lakes region [Draft, page 54]. "*Because the Midwestern landscape has been drastically altered since European settlement, maintaining the quality of remaining stopover sites is critical if birds are to reach their breeding or wintering grounds in good physiological condition... Larger, more ecologically diverse tracts of land with natural mosaics of forests, wetlands, grasslands and openings, are likely to be consistently attractive to many migrant species...*" [Ewert and Hamas 1995].¹

The Friends is concerned that Long Island, which is excluded from wilderness designation in Alternative C, is a key island for these birds. According to the Draft Wilderness Study, "... *Long Island[s] provide[s] key habitat for migratory birds*" [Draft, page 55]. "...*Long Island is important for waterfowl, passerines and shorebirds.*" [Draft, page 55]. **The National Park Service must ensure the continuing protection of these birds' habitat if Long Island is no longer protected as wilderness which it has been, *de facto*, since 1989.**

Furthermore, the Draft Wilderness Study states, "*Long Island is the only location where piping plovers have successfully nested in the state of Wisconsin in recent years*" [Draft, page 55]. The piping plover is an endangered species in the Great Lakes area. The coastal beaches traditionally used for nesting have been lost to commercial, residential, and recreational development.

On May 7, 2001 the U.S. Fish and Wildlife Service's final determination of critical habitat for the Great Lakes breeding population of the piping plover was published in the Federal Register [Federal Register 2001]. This final rule designated two critical habitat units within the Apostle Islands. The Western Michigan Island Beach and Dunes unit lies entirely within the Apostle Island National Lakeshore and is designated as "suitable" for plover use. The Long Island/Chequamegon Point unit lies partially within the Apostle Islands National Lakeshore and is designated as "current" for plover use.

Continues next page

7. The protection of the black bear population on Sand and Stockton Islands is beyond the scope of this wilderness study. Whether or not wilderness is designated in the park, we would continue to work with the Wisconsin Department of Natural Resources and the Great Lakes Indian Fish and Wildlife Commission to ensure that the black bear population is maintained. No new developments are being proposed on the islands that would affect the bears. If action is needed to protect the bears from an increase in human activity, which again could happen regardless of whether or not wilderness is designated, this would be addressed in a future management plan and environmental document.

8. We agree that Long Island is important habitat for migratory birds and critical habitat for the piping plover. Whether or not Long Island is designated as wilderness, the National Park Service would continue to protect Long Island's valuable habitat to help satisfy the purposes for which the park was established, as a natural zone in the park's current *General Management Plan*, and in the case of the piping plover as required under the Endangered Species Act. While wilderness might be a good way to ensure protection of critical habitats, it is not the only way.

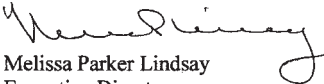
With regard to section 7 consultations on the wilderness study, as noted on p.107 the study team initiated informal consultations with the U.S. Fish and Wildlife Service in June 2001. The Fish and Wildlife Service's response, on pages 116-117, stated that listed species or critical habitat would not be affected by the proposed activity, and noted there was no need for further action on this project.

¹ Ewert, D.N. and M.J. Hamas. Ecology of Migratory Landbirds During Migration in the Midwest. In, Management of Midwestern Landscapes for the Conservation of Neotropical Migratory Birds. F.R. Thompson editor. General Technical Report NC-187, North Central Forest Experiment Station. U.S. Forest Service, U.S. Department of Agriculture.

Clearly, Long Island is an important refuge for birds, including the endangered piping plover. As non-wilderness, we fear the potential loss of this key bird habitat. Section 7 of the Endangered Species Act (ESA) states, "Each Federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency...is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species..." [16 U.S.C. § 1536 (a)(2)]. We, however, see no evidence of Section 7 consultation with the U.S. Fish and Wildlife Service. **We request that the final Wilderness Study include a discussion of how the Park Service will comply with its legal responsibility to not adversely modify or destroy critical habitat when Long Island changes from *de facto* wilderness to non-wilderness.**

Again, the Friends appreciates the opportunity to comment on the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. We look forward to receiving more information as the process progresses.

Sincerely,


Melissa Parker Lindsay
Executive Director


Sarah Strommen
Policy Director

/mpl

HOWARD COUNTY BIRD CLUB

9045 Dunloggin Court
Ellicott City, Maryland 21042
krschwal@comcast.net

October 16, 2003

Apostle Islands National Lakeshore
Attention: Wilderness Study
Route 1, Box 4
Bayfield, WI 54814
apis_comments@nps.gov

To the National Park Service:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the draft wilderness study and environmental impact statement for Apostle Islands National Lakeshore, Wisconsin.

Members of the Howard County Bird Club take an interest in this study, as the Apostle Islands have important values for birds and other forms of wildlife. The American Bird Conservancy has named the Apostle Islands as one of its Globally Important Bird Areas.

The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. Our members travel all over the United States to visit national parks, lakeshores and other federal lands on birding and nature-watching vacations. We spend dollars on food, lodging, books and souvenirs to support the local economy wherever we go. Moreover, birding is one of the fastest-growing outdoor sports.

Wildlife Values

In Apostle Islands National Lakeshore, breeding bird studies by NPS have recorded 150 species. More than 200 species of birds have been recorded there in NPS migratory bird surveys. Notable birds include Bald Eagle and Piping Plover, and both have been recorded nesting in the Apostle Islands. Some 37 species of mammals are known in the area, and the black bear is especially noted and often seen by visitors. In addition to the shoreline habitats, the islands are noted for their old-growth forest, a valuable remnant of the primeval forest that once covered so much of the region surrounding Lake Superior.

History

Apostle Islands National Lakeshore is situated in Lake Superior at the northern tip of Wisconsin. It includes 21 islands, ranging in size from 3 acres to 10,000 acres. The national lakeshore was created by an Act of Congress in 1970, championed by Senator Gaylord Nelson of Wisconsin. The wilderness study comes at this time because Congress in a FY 2001 appropriations bill directed NPS to conduct a wilderness study for Apostle Islands. Most of the National Park System was reviewed for wilderness potential in the years from 1964 to 1974 under the mandate of the Wilderness Act of 1964.

The Apostle Islands contain not only outstanding natural values, but historic features that are sought by visitors. These include six light stations dating from the 19th Century and pioneer homesteads. These features are excluded from the proposed wilderness areas, along with lands needed for visitor-use facilities and the waters between the islands.

Wilderness Recommendations

The NPS wilderness study analyzed four alternatives for designation as wilderness, ranging from no wilderness (Alternative A) up to a maximum of 94 percent of the land base (Alternative B). The NPS preferred alternative is Alternative C, covering 80 percent of the land base.

The Howard County Bird Club favors a modified Alternative C as proposed by Friends of the Boundary Waters. That modification adds most of Basswood Island to the areas recommended for wilderness designation. This island was found by NPS to have wilderness character, and it can be included in the wilderness by excluding a dock on the west side of the island and an old quarry on its southern tip.

The wilderness designation is a means of securing an added measure of protection of the natural values of the Apostle Islands. We cannot now foresee what threats may be leveled at the islands in decades to come, but the history of the National Park System is filled with development proposals hostile to park values. The protective language of the Wilderness Act of 1964 becomes part of the protective bulwark, in addition to the Organic Act of the National Park Service.

Members of the Howard County Bird Club know that wilderness designation has worked very well for Shenandoah National Park, Virginia. It is in our region and is often visited by club members. The wilderness designation was enacted in 1979, covering several tracts of the Blue Ridge Mountains. The park is readily accessible by state highways, county roads, and by the Skyline Drive running the length of the national park. From those roads we enter the wild lands on foot. Even from the roadside we enjoy the outstanding vistas of wild forest which are protected by the wilderness designation.

The same values should accrue to Apostle Islands National Lakeshore from the wilderness designation. You will have the most natural lands preserved with statutory protection, while the public will have ready access by kayak, motorboat and sailboat to the shores of the islands.

In conclusion, the Howard County Bird Club endorses the citizens' recommendations for wilderness and asks the National Park Service to modify the preferred alternative and include most of Basswood Island in the wilderness recommendation.

Thank you for considering our views.

Sincerely,

Kurt R. Schwarz
President

October 17, 2003

Apostle Islands National Lakeshore
Attn: Wilderness Study
National Park Service
Route 1, Box 4
Bayfield, WI 54814

Dear National Park Service Staff:

On behalf of the Izaak Walton League of America, I wish to submit the following comments on the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. Please include these comments in the official record.

The Izaak Walton League of America is a national nonprofit conservation organization, first formed in 1922. The League's work is supported by a membership of 50,000 people across the country who fish, hunt, recreate in, and enjoy the outdoors. The League has a long track record of involvement in wilderness and public lands issues nation-wide.

The Izaak Walton League supports Wilderness designation at the Apostle Islands National Lakeshore. We believe that Wilderness designation best protects the wild beauty and wilderness character of the Apostles for current and future generations, and best protects the natural resources of the islands from degradation and development. Our specific comments follow.

1. Plan Alternative. The League supports Alternative B in the Draft Wilderness Study and Environmental Impact Statement. This alternative most closely matches how the Apostles have been managed over the past number of years, and would involve the least amount of change in management. As the Draft Plan states on page 29, "Of all the alternatives, alternative B would be most similar to how Apostle Islands National Lakeshore is currently being managed...."

Since adoption of the park's general management plan in 1989, most of the land mass of the Apostle Islands has been recognized as suitable for wilderness and managed as wilderness. This is in accord with the National Park Service's management policies to manage as *de facto* wilderness all those lands recognized as suitable for wilderness, at least until Congress had acted to actually designate formal Wilderness.

Alternative B would designate approximately 39,500 acres of land as Wilderness, all of it on the islands and none of it on the mainland. None of the waters surrounding

the Apostles would be designated as Wilderness. Under this alternative, approximately 57% of the park's lands and waters would be designated as Wilderness.

Alternative B would also exclude from Wilderness designation the non-suitable areas such as the light houses and associated cultural developments, public docks, the Manitou Fishing Camp, the housing and administrative areas on Stockton, Rocky, Oak, and East Bay of Sand Island, the southeast tip and West Bay Club of Sand Island, and the mainland strip of land.

This alternative would also provide Wilderness designation to Long Island. Long Island is especially important as habitat for waterfowl, passerines, and shorebirds. In particular, the U. S. Fish and Wildlife Service has designated Long Island as critical habitat for the piping plover, a federal- and state-listed endangered species. As the Draft Plan states, "Long Island is the only location where piping plovers have successfully nested in the state of Wisconsin in recent years." Wilderness designation would best protect this critically important habitat.

Alternative B also would preclude future developments in those areas of the park designated as Wilderness. The Draft Wilderness Study discusses future developments at length in the areas of the Apostles that would lose their protection as *de facto* wilderness, and Alternative B would tightly limit those areas that will lose this protection.

1. **2. Wilderness Suitability Criteria.** The discussion on page 10 of the draft plan implies that it is only through the Eastern Wilderness Act that Congress allowed for consideration of areas as wilderness that are no longer "pristine." It is not just the Eastern Wilderness Act that provides this guidance, nor is the discussion about "pristine" character accurate or appropriate.

The 1964 Wilderness Act, the federal law that established the National Wilderness Preservation System, provided two different sets of criteria for dealing with Wilderness areas, one set for how to qualify for Wilderness designation, and another for how areas are to be managed once they are designated as Wilderness. The two sets of criteria are not the same.

Section 2 (c) of the Wilderness Act established the criteria for areas to enter the National Wilderness Preservation System, and these criteria did not include any standard for being "pristine." Rather, this section says that a potential wilderness area "*generally* appears to have been affected *primarily* by the forces of nature, with the imprint of man's work *substantially* unnoticeable..." (Emphases added.) These are not standards for pristine character. Rather, Congress expected to and has designated areas as Wilderness that have been impacted by human manipulation and are not pristine. An example of such designation is the Boundary Waters Canoe Area Wilderness, where Congress designated as Wilderness areas that had clearcuts, resorts, or roads in them in both 1964 and 1978.

Section 4 of the 1964 Wilderness Act includes the higher standards of wilderness stewardship for lands once Congress designates them as wilderness. It is this section that sets out how wilderness areas must be managed ("there shall be no commercial enterprise and no permanent road...", "no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.") These are higher standards than those Congress set forth for designation, and these stewardship guidelines are the ones that approximate pristine character.

Therefore, it is not just the Eastern Wilderness Act that allows the designation of areas damaged by past human activity as wilderness, but the 1964 Wilderness Act as well. And Congress can and should designate parts of the Apostle Islands where humans have impacted the landscape, including such impacts as old farmsteads and old quarries.

Responses to Izaak Walton League

1. The discussion about "pristine" areas being wilderness was included because during the course of the wilderness study process a number of people argued we should not be proposing any part of the park for wilderness designation because this is not a pristine landscape. We agree with your point that it is not just the Eastern Wilderness Act that allows for consideration of areas like the Apostle Islands as wilderness. Your discussion of section 2(c) of the Wilderness Act was in fact acknowledged on p.4 of the draft document. To clarify the text on p.10, the final study notes that in both the Wilderness Act and the Eastern Wilderness Act, Congress recognized that areas smaller than 5,000 acres that have been altered by past human activity can be designated as wilderness.

2. **3. Historical Interpretation within Wilderness.** Some public comments, articles, and the Draft Wilderness Study have all expressed a concern about the ability of the National Park Service to conduct historic interpretation, particularly of cultural resources, in areas that might be designated as Wilderness. This concern is, I believe, misplaced.

Historical values are recognized as a legitimate part and value of designated Wilderness. Section 2 (c) recognizes that Wildernesses contain features of "historical value." Section 4 (b) says that Wilderness areas should be devoted to a wide variety of public purposes, including "historical use."

The National Park Service can and should continue to conduct historical interpretation of sites in the Apostles even after these sites are designated as Wilderness. Wilderness designation does not preclude historical interpretation. The *level* of interpretation in Wilderness may not be as developed or intrusive as it might be in non-wilderness areas, where signage, interpretative displays, visitor facilities, etc., can be utilized. But the National Park Service can still conduct wilderness-appropriate historical interpretation in Wilderness areas, and the Park Service must not use this argument as a straw man to oppose a more extensive wilderness recommendation than that proposed in Alternative C, the preferred alternative.

3. **4. Future Development in the Apostle Islands National Lakeshore.** The preferred alternative, Alternative C, suggests fairly extensive future development for the Apostles in those areas that lose their *de facto* wilderness protection. Such development must not be allowed, and the Izaak Walton League opposes such development.

The Draft plan, for example, states on page 33 that Basswood and Sand Islands "are ideally suited for the expansion of interpretive opportunities, such as some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands." On the following page, the Draft plan states that the former fishing community on Rocky Island "keeps open the possibility of providing additional visitor developments to accommodate increased use in one of the park's most popular areas." On the same page, regarding Stockton Island, the Draft plan continues that the new boundary would "keep open the possibility of providing additional visitor developments to accommodate increased use in the immediate vicinity of these popular areas."

The Apostle Islands National Lakeshore already provides ample facilities for its visitors, and new facilities are not needed. The Park Service must not delete areas from the agency's recommendation for Wilderness just so it can build more facilities and developments.

The Izaak Walton League of America appreciates the opportunity to comment on the Draft Wilderness Study and Environmental Impact Statement for the Apostle Islands National Lakeshore. The League supports Alternative B as the alternative that best protects the Apostles' wilderness character and best prevents the National Park Service from building unneeded and incompatible developments. Please keep us informed of the Wilderness study process as you move ahead.

Sincerely,

Kevin Proescholdt
Midwest Director
Wilderness and Public Lands

2. We agree that we can and should continue to provide historical interpretation of sites on the islands even after these sites are designated as wilderness, and that the level of interpretation in wilderness would differ from nonwilderness areas. However, in the case of Basswood and Sand Islands we believe opportunities for more intensive interpretation techniques, some of which would not be permitted in wilderness, should not be foreclosed. See also response 2 to the Friends of the Boundary Waters Wilderness and response 1 to Brandt Mannchen.

3. See responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, and responses 1 and 4 to Brandt Mannchen.

NATIONAL PARKS CONSERVATION ASSOCIATION®

Protecting Parks for Future Generations®

October 14, 2003

Bob Krumenaker
Superintendent
Apostle Islands National Lakeshore
National Park Service
Route 1, Box 4
Bayfield, WI 54814

Dear Mr. Krumenaker:

Thank you for the opportunity to comment on Apostle Islands National Lakeshore's Draft Wilderness Study and Environmental Impact Statement regarding the potential designation of wilderness in the national lakeshore.

The National Parks Conservation Association (NPCA) is a private, nonprofit organization dedicated to protecting and enhancing America's national parks for present and future generations. Approximately 300,000 Americans are members of NPCA, including 6,900 in Wisconsin and 6,200 in Minnesota. On behalf of these supporters of our national parks, NPCA expresses its appreciation to the National Park Service and the staff of Apostle Islands National Lakeshore for taking the first steps toward designating a wilderness area within the park's boundaries.

As you know, the park includes twenty islands of the Apostle Islands archipelago and a narrow strip of the Wisconsin mainland on the Lake Superior coast. These lands are a national resource of great ecological, historical and recreational value to our members and to the American people, and they merit the highest form of protection available to our public lands. Although the park's current General Management Plan requires that the park be managed as wilderness, this is a temporary protection that can too easily be reversed by future revisions to the plan.

Accordingly, NPCA strongly supports the Draft Wilderness Study's preferred alternative (Alternative C), with the additional wilderness designation of those parts of Basswood Island not immediately surrounding the island's public dock or the quarry at the island's southern end. If implemented by Congress, this revised alternative would provide continued opportunities to preserve and communicate the park's human history while extending permanent wilderness protection to a sufficiently extensive portion of the park.

Qualification under the Wilderness Act

The Wilderness Act (16 U.S.C. §1131 through §1136) establishes several criteria that define wilderness and that narrow the potential scope of any wilderness designation within Apostle Islands National Lakeshore. As the park states in its Draft Wilderness Study, wilderness may include only "undeveloped Federal land," a requirement that disqualifies the state-owned waters and submerged lands that ring the park's federally owned islands, as well as the park's substantially developed mainland unit. The Act also requires that wilderness be "without permanent improvements or human habitation," disqualifying the handful of light stations, docks, and administrative facilities that are a permanent presence on some of the park's islands.

There is little question, however, that the remainder of the lakeshore's lands (39,500 acres, or 94 percent of the total) meets the statutory qualifications for wilderness. Indeed, the overwhelming majority of the park has already been managed as wilderness for years. Visitors to the lakeshore regularly enjoy camping, hiking, and other forms of "primitive and unconfined...recreation" on the islands, often arriving by kayak or motorboat before proceeding on foot into the backcountry. The interiors of the islands are isolated and undeveloped, and they support an increasingly wild ecosystem alongside the remaining artifacts of earlier human activity. The Wilderness Act requires that "the imprint of man's work [be] substantially unnoticeable," not wholly absent, and the park's islands meet this standard with the exceptions listed above.

Choosing the Scope

Because so much of the park is eligible, the crucial question is how much of the park's eligible area should be recommended for wilderness designation. Although its enabling legislation does not specifically address the extent to which the park's wilderness character is to be preserved, other legislative acts provide clearer guidance. While the Wilderness Act offered only a general call to protect wild lands, Congress gave much more specific and pressing guidance in the subsequent Eastern Wilderness Areas Act, which identified "an urgent need to identify, study, designate, and preserve areas for addition to the National Wilderness Preservation System" "in the more populous eastern half of the United States." Congress further declared it to be "in the national interest that these and similar areas...be promptly designated as wilderness...."¹ While 28 years have elapsed since this Act's passage, legally protected wilderness remains scarce in Wisconsin, the Midwest, and in the eastern United States as a whole. Designating a substantial portion of the Apostle Islands as wilderness would represent a significant stride toward meeting Congress' objective of protecting wilderness resources where they are in short supply.

Ensuring a broad wilderness designation would also be consistent with the conditions spelled out by the State of Wisconsin in its agreement to donate the park's lands to the

¹ Eastern Wilderness Areas Act, P.L. 93-622, §2(a)(2) and 2(b).



1300 19th Street, N.W. • Suite 300 • Washington, D.C. 20036
(202) 223-NPCA(6722) • Fax (202) 659-0650
npcan@npcan.org • www.npcan.org

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federal government. Although the state's legislature recognized that the lakeshore would have multiple purposes, including "the benefit, inspiration, education, recreational use, and enjoyment of the public," it also explicitly stated that the islands were to "be managed in a manner that will preserve their unique primitive and wilderness character...into perpetuity."² States are quite understandably jealous of their sovereignty over their natural resources, and it is very rare that a state voluntarily chooses to give over some of its most inspiring and beautiful lands to federal ownership. The area of the park excluded from wilderness for other purposes should be minimized in order to honor the exceptional gift of the people of Wisconsin.

The park has offered two main justifications in the Draft Wilderness Study for recommending a wilderness designation that features such exclusions. First, the park is concerned that too sweeping a wilderness designation will prevent park staff from actively maintaining the park's cultural resources and fulfilling its obligation "to preserve and tell the stories of the Apostle Islands." In light of this concern, a handful of carefully chosen exclusions from wilderness designation would be reasonable.

Second, the park asserts that designating a wilderness area that has too few nonwilderness enclaves will leave future park staff with nowhere to install future developments except in the small areas surrounding the public docks, where they may do harm to cultural resources that sit just outside the wilderness area. This second concern has substantially less merit than the first.

1.

Balancing Cultural Resources and Wilderness

NPCA recognizes that the National Park Service must consider a number of priorities and obligations in crafting a recommendation for wilderness designation. The park's responsibility to maintain and interpret the cultural resources of the islands for visitors is an important priority, but it meshes imperfectly with the requirements of wilderness management. Fully preserving the physical evidence of human history and communicating its stories to visitors would require a degree of active maintenance and interpretive signage that is incompatible with the spirit and the legal requirements of wilderness. As a result, even though a modest extent of cultural resource upkeep is permitted in wilderness, some commentators have expressed an understandable concern that a wide-ranging wilderness designation will keep the park from interpreting and preventing the decay of its cultural resources.

Under the current circumstances, some trade-offs between the two priorities of wilderness and historical preservation are inevitable. However, the park has offered the basis of a reasonable compromise in its preferred alternative, Alternative C. Rather than allowing all of the park's human history to molder or insisting that each cultural resource of interpretive interest be actively preserved, the park would exclude two entire islands (Basswood and Sand Islands) on which preserving and interpreting a representative cross-section of cultural resources would be a top management priority. (The preferred

² Wisconsin Statutes, §1.026(1)(b).

Continues next
page

Responses to National Parks Conservation Association

1. We believe there are other reasons to exclude Basswood Island from the wilderness proposal besides the need to protect, maintain, and interpret the park's cultural resources. By keeping the island as a nonwilderness area we would retain flexibility to provide limited developments in a small part of the park to address increasing visitation and/or provide for other visitor experiences that wilderness would preclude. See also response 2 to PEER.

alternative would also exclude a third island, Long Island, out of deference to the claims of local Indian tribes to the use of that land.)

This is a generally sound approach, but the park can protect and interpret a representative set of its cultural resources without excluding both Basswood and Sand Islands from wilderness. Because the two islands offer many of the same types of cultural resources, only the more developed Sand Island should be fully excluded. By itself, Sand Island would offer visitors a rich assortment of cultural resources, including a light station, old pioneer farmsteads, and the overgrown remains of roads, settlements, logging camps, and orchards. Because Sand Island does not contain any of the archipelago's brownstone quarries, the park should also exclude Basswood Island's quarry from the recommended wilderness area but leave the remainder of that island within the proposed boundaries. If revised along these lines, Alternative C would still offer park staff substantial flexibility in managing the park's cultural resources, leaving an impressive array of historical assets on Sand, Basswood, Stockton and Rocky Islands open to maintenance and interpretation.

2.

Allowing Room for Development

The Draft Wilderness Study cites the prospect of future development of park facilities on the islands as another factor in deciding the scope of a wilderness designation. Throughout most of the study, the park operates on the premise that such development would likely harm the park's resources and might occur in the future if park managers are not constrained by statutory wilderness protection. On this basis, the park rightly concludes that Alternative C (the preferred alternative) offers better protection to all resources than the no-action alternative or the much more modest Alternative D, which "would have more areas where natural and cultural resource impacts could occur due to future developments."

More dubiously, though, the study also concludes that Alternative B, despite designating the most expansive wilderness area possible, offers inferior protection to the park's cultural resources compared to Alternative C. The study argues that an overly broad wilderness designation would restrict any future developments "to a relatively few areas [outside lands eligible for wilderness] that also contain a high concentration of cultural resources," which would be adversely affected by the developments. Alternative C, on the other hand, would deny wilderness designation to certain areas adjacent to these concentrations of cultural resources, thereby offering "a broader range of options when planning future development, resulting in less pressure on individual locations" and cultural resources.

Although the end result of this development logic is the same as the result of the reasoning we supported above under "Balancing Cultural Resources and Wilderness" -- namely, a wilderness designation narrower than the maximum possible -- we find this particular argument to be unconvincing and likely to set a regrettable precedent. If the park is concerned that future managers will unwisely decide to allow development that causes collateral damage to cultural resources, it should not seek to *broaden* the geographical range in which these ill-advised developments may be installed. The park would be better advised to protect the resources in these nonwilderness areas by offering them temporary protection -- possibly through the park's General Management Plan -- than by denying permanent wilderness protection to areas that merit it.

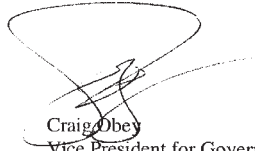
2. We disagree with the implication that any new developments would be "ill advised." There are a variety of legitimate reasons why new developments may be needed on the islands, which will be addressed in future plans (see p.68). We agree that the general management plan could be used to protect the park's cultural resources if new developments are built on the islands. And we would try to carefully locate any new developments in areas that do not have cultural resources, and to mitigate any possible impacts that could occur. But under alternative B there would be very few nonwilderness areas where these developments could be located on the islands. Those nonwilderness areas are rich in cultural resources, which would increase the chances of unforeseen impacts occurring to cultural resources that we are not aware of. (As noted on p.56 of the draft, there are likely many additional cultural resources that have not yet been discovered. See also p.82.)

Conclusion

Many of the other concerns that often accompany efforts to designate new wilderness do not apply here, due in part to the park staff's admirable efforts to engage the local community and address its concerns. Because the park has placed the islands' public docks outside of the wilderness area in all of its alternatives, boat access to the islands will be unaffected. A substantial wilderness designation would also have a continuing positive impact on the local economy, since it would ensure the preservation of the wilderness character that attracts so many of the thousands of visitors who visit the park each year.

It is rare that such a strong consensus exists around permanently protecting such a valuable national resource as the Apostle Islands, and we urge the National Park Service to do all that it can to seize this opportunity. We thank you and your staff for your substantial efforts on behalf of this project, and we urge you to recommend the areas designated in Alternative C, modified to include the majority of Basswood Island, for statutory protection as wilderness.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Obey", is written over a circular stamp. The signature is fluid and cursive.

Craig Obey
Vice President for Government Affairs
National Parks Conservation Association



Public Employees for Environmental Responsibility

2001 S Street, NW • Suite 570 • Washington, D.C. 20009 • 202-265-PEER(7337) • fax: 202-265-4192
e-mail: info@peer.org • website: http://www.peer.org

Hearing Officer
c/o Mr. Jim Nepstad
National Park Service
Apostle Islands National Lakeshore
Rt. 1, Box 4
Bayfield, WI 54814

August 29, 2003

Dear Hearing Officer:

In this letter Public Employees for Environmental Responsibility (PEER) submits its comments on the wilderness study for Apostle Islands National Lakeshore. We request that the Hearing Officer include these comments in the official record of the public hearing and as in the analysis of comments in the final environmental impact statement for the wilderness study.

PEER requests that the National Park Service adopt Alternative B – the "Maximize Wilderness" alternative. Under Alternative B, 39,000 acres, or 94% of the park's roadless land area, would be preserved and managed for its wild character. Since 1989, the NPS has managed, and is now managing, 97% of the park's land area as de facto wilderness. Alternative B would most closely approximate the protection now afforded these roadless lands.

By contrast, the NPS preferred alternative (Alternative C) would remove the current protections that now administratively safeguard 6,000 acres of roadless park lands. PEER opposes Alternative C because it is a step backwards.

Alternative B is not as far-reaching as the NPS draft would indicate. Even if adopted, Alternative B would designate only 56% of the park as wilderness. Motorboats will continue to operate in all of the waters within the park boundary, which constitute 27,000 acres (39%) of the park. Moreover, 6% of the park's lands, consisting of the mainland unit and some minor enclaves on the islands, would not be wilderness. Thus, under Alternative B, only those park areas qualified for wilderness preservation would be wilderness, with little or no disruption to established uses such as hunting, fishing, camping or motor boat landings.

1. The NPS' Preferred Alternative would eliminate from a wilderness proposal all of Sand, Basswood and Long Islands. By eliminating these islands from further consideration, the NPS would make possible future new developments that would change the character of the islands. PEER believes that the roadless portions of the three islands be maintained as they are for present and future generations.

Continues next

Field Offices: California • Maine • Montana • New England • Refuge Keeper • Rocky Mountain • Southwest • Tennessee • Texas • Washington



Responses to PEER

1. Although it is true that future new developments could occur on the three islands that would not be designated wilderness, it is highly unlikely that developments would be permitted that would "change the character of the islands." Such developments would be contrary to the purposes for which the park was established by Congress. In all cases we would continue to protect the islands' resources and overall character in accordance with NPS plans and policies.

2.

The NPS rationale for eliminating the three islands from a prospective wilderness proposal is specious, contrary to law and at times, simply unexplained in the Draft Study.

Basswood and Sand Islands

The NPS proposes to eliminate from a wilderness proposal Basswood and Sand Islands "to ensure that future opportunities for interpreting the environmental history of the Apostle islands be preserved." Draft p. 33.

The Draft states that, without wilderness, the island would be "easier to manage" and the NPS would find "more opportunities to tell stories about the islands(s) and interpret resources in ways that wilderness would not allow..." Draft p. 34.

None of the NPS reasons for excluding the islands are valid. There is nothing in the Wilderness Act that precludes the NPS from interpreting the islands' natural or cultural features. Nor does the Wilderness Act prevent the NPS from telling "stories about the islands." The NPS states that it may want to develop the roadless portions of these islands "to provide for increased use." Draft p. 34. But even such developments would not preclude wilderness from the entire island but only from any small, developed areas.

PEER believes that an unspoken agenda is at work here. Perhaps, the NPS vision of a possible way to interpret the environmental history of the islands is to engage in, or authorize others to engage in, large-scale landscape manipulation. Among the possibilities that the NPS may be contemplating is reinstitution of human occupation through lease and sale of Federal lands under 16 U.S.C. 4601-22(a) or other mechanism, so that the new occupants can recreate past husbandry and commercial practices.

The NPS would allow this under the guise of restoring a "cultural landscape." And, yes, the NPS is correct, the Wilderness Act would preclude this as a possible way of telling stories about the islands.

PEER's suspicion is abetted by the NPS statement that excluding Basswood and Sand Islands "would provide for flexibility in planning the preservation and interpretation of pioneer farmsteads," "historic stone quarries" and "logging camps." Draft p. 83. In any case, the NPS must lay out what it means by preserving and interpreting these features. Since the NPS states that limiting the possibilities to interpret resources is the main reason to eliminate the islands from wilderness consideration, the NPS must be more specific about exactly which possible methods of preservation and interpretation would be foreclosed by wilderness designation.

The NPS states that Sand Island "still has extensive evidence of human occupation" as another reason for not including the island in the preferred alternative. Draft p. 34. But, in the 1989 General Management Plan, the NPS concluded "...that most of the park's land base was recovering and could reasonably be protected as wilderness." Draft p.9. That includes Sand Island. Such lands qualify for a wilderness recommendation to Congress both under the NPS Management Policies (2001) and under the intent of the Wilderness

2. Part of the mission of the National Park Service is to provide for visitor use and enjoyment of the units it manages. Not all visitors are seeking wilderness experiences, and the National Park Service is not required to propose all lands found suitable for wilderness as wilderness. In the case of Basswood and Sand Islands we agree that wilderness would not preclude the agency from interpreting features or telling stories. But we believe that by keeping these islands as nonwilderness areas, we would have flexibility in the future to provide limited developments to address increasing visitation and/or provide for other visitor experiences that wilderness would preclude. It is not the purpose of this wilderness study to determine if these facilities are needed, what they might be, and where they would be located (as noted on p.68). The facilities could include day use picnic areas, new group campsites, universally accessible paved trails, shelters, and amphitheaters. In addition, wayside exhibits or interpretive trails with signs could be provided in nonwilderness areas, which interpret resources in different ways than brochures or distant signs. (See the list of uses and developments prohibited in wilderness on p.5.) We do not foresee the need for, and would not permit, "large-scale landscape manipulation," or the lease and sale of federal lands to re-create past agricultural and commercial practices.

With regard to Sand Island, we do not believe that Senator Church's statement applies. Excluding Sand Island from wilderness would not be a "massive exclusion." There are several reasons why Sand Island was not included in the preferred alternative. As noted on p.34, the island still has extensive evidence of recent human occupation, and keeping the island as non-wilderness would keep open the option of providing for new developments to interpret stories about the island and to provide for increases in visitation. In addition, the proximity of Sand Island (as well as Basswood Island) to the Bayfield Peninsula and the number and variety of cultural sites it contains makes it well suited for the development of additional interpretive facilities. Indeed, in establishing the park Congress separated Sand Island from the other islands with regard to its intent to keep the islands wild and primitive (see Jordahl (1994) as referenced on p.6). Furthermore, keeping the island as nonwilderness would help acknowledge and preserve the history of many of the families that lived on the island. Finally, any wilderness area on Sand Island would be fragmented, and difficult to manage as wilderness, due to the presence of historic residences, structures, a campsite cluster, a ranger station, and tracts with various encumbrances (a nonfederal tract, areas with nonfederal mineral rights, and tracts with life estates and use and occupancy agreements) all scattered around the island.

Act. Senator Frank Church made this clear to then Assistant Secretary of the Interior Nathaniel Reed in the wilderness oversight hearings of May 5, 1972. Senator Church stated that

"[I]n the absence of good and substantial reasons to the contrary, (wilderness) areas within national parks should embrace all wild land. There is no lawful basis for massive exclusions (from wilderness recommendations) of qualified lands on which no development is planned." U.S. Senate Hearings, Subcommittee on Public Lands, May 5, 1972, pp. 59-60.

The NPS Draft proposes to exclude Basswood and Sand Islands (a relatively major exclusion in proportion to the whole) from a wilderness proposal in the absence of "good and substantial reasons."

For the foregoing reasons, PEER urges the inclusion of 99% of Basswood Island and 97% of Sand Island in the wilderness proposal.

3.
- Long Island**

The NPS fails to explain why Alternative C excludes Long Island from a wilderness proposal except for a brief reference to "cultural resources" on page 83. The Draft also points out that the Bad River Band of Chippewa expressed concern over Long Island being within designated wilderness. Draft p. 105.

Ninety-nine percent of Long Island qualifies as wilderness (i.e. all of the island except for the two light station enclaves). PEER calls upon the NPS to include Long Island in the wilderness proposal to the Secretary of the Interior.

4.
- The Backlog**

PEER advises the NPS to formulate wilderness and other decisions that will reduce, not increase, the growing liability of future construction and maintenance costs. It does little good to rail against the backlog of unmet maintenance needs if the NPS adopts proposals that will only add to that burden. Constructing developments or costly manipulative actions to perpetuate farms, logging camps and rock quarries on Basswood and Sand Islands would only add to the backlog.

More disturbing, such developments are unnecessary and come at the expense of the wild values for which Apostle Islands will be increasingly treasured.

Summary
Alternative C excludes 6,000 suitable acres from the wilderness proposal that are qualified for wilderness designation. The NPS prefers Alternative C because the NPS may seek to halt the natural restoration of formerly disturbed lands and instead to perpetuate the human perturbations of farming, rock quarrying and logging facilities.

3.
- The text has been revised to indicate Long Island was excluded from the preferred alternative, and the rationale for not including it has been provided. Long Island is marginally suitable for wilderness designation due to the presence of two light stations and its narrow linear nature. The island has a high level of day use, which combined with the narrow nature of the island, limits opportunities for solitude during the summer months. In addition, the island would have required at least two areas of nonwilderness (the areas surrounding the two lighthouses) and possibly a third, making the boundary complex and the potential for wilderness acreage smaller. Finally, the Bad River Band of Lake Superior Tribe of Chippewa Indians did not support wilderness designation for Long Island because they believe it may be within their reservation and do not want an additional designation of the island to potentially interfere with that claim.
4.
- None of the alternatives included in this wilderness study, including the NPS preferred alternative, would necessarily add to the backlog of unmet maintenance needs. This wilderness study was not intended to address whether or not additional developments would be built or actions would be taken to perpetuate cultural resource sites on Basswood and Sand Islands. The study simply was intended to determine if areas within the park should be proposed for wilderness designation. For purposes of the analysis of impacts of wilderness designation, it was necessary to generally examine possible management actions and developments that might and might not occur in the wilderness and nonwilderness areas. It was assumed for purposes of this analysis that some developments would be built in the nonwilderness areas, consistent with the park's general management plan. But none of the developments analyzed in this study are being planned for or advocated by the National Park Service. No new developments on the islands would be proposed without first being analyzed in a future plan and/or environmental document, with opportunities for public involvement, and in compliance with the National Environmental Policy Act. Please see pages 67-69.

In light of the Organic Act mission of the NPS, the enabling act for Apostle Islands and the Wilderness Act, PEER urges the NPS to adopt Alternative C. That is the only alternative that aims at preserving the nascent wild character of all the Apostle Islands.

Sincerely,



Jeff Ruch
Executive Director

cc: Senator Russell Feingold
Senator Herb Kohl



SIERRA
CLUB
FOUNDED 1892

John Muir Chapter

Sierra Club - John Muir Chapter
222 South Hamilton Street, Suite 1, Madison, Wisconsin 53703-3201
Telephone: (608) 256-0565, Fax: (608) 256-4562
csterrell@execpc.com; wisconsin.sierraclub.org

October 17, 2003

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814-9701

RE: Wilderness Designation of Apostle Islands National Lakeshore

Dear Wilderness Coordinator,

The Sierra Club-John Muir Chapter has over 13,000 members statewide who regularly enjoy the many recreational and scenic resources of Wisconsin. The Apostle Islands stand out as one of these gems and deserve national protection as designated wilderness.

The Sierra Club fully supports the National Park Service's efforts to permanently protect parts of the Apostle Islands National Lakeshore from any future development by designating them Wilderness Areas while maintaining historic and cultural aspects on them. Much of this area has been managed as wilderness since 1989, following a study that concluded over 97% of the lands in the Apostle Islands are suitable for wilderness designations.

The Sierra Club calls on you to designate the maximum amount of land of the Apostle Islands possible as wilderness area while keeping in mind that doesn't mean we must remove all traces of past human activity from the wilderness areas. We urge the National Park Service to expand your preferred alternative, Alternative C, in the ways outlined in the proposal "*A Shared Vision for Protecting the Rich Cultural Heritage and Remarkable Natural Features of the Apostle Islands*" endorsed by the Friends of the Apostle Islands National Lakeshore, July 31, 2003.

We concur with the *Shared Vision* statement that new legislation should formally designate as wilderness—the highest form of protection that any land can receive in the United States—the extensive portions of the park that so qualify, while also strengthening the mandate to interpret Apostle Islands history at appropriate locations and affirming ongoing recreational uses of the park.

In recognition of its existing wilderness values, Basswood Island should be added to the Wilderness proposal with the following exclusions:

- 1) At the dock on the west side of the island, including the existing campground development (consistent with similar exclusions elsewhere in the islands);

- 2) At the southern tip of the island south of an east-west line just north of the Bass Island Brown Stone Quarry.

We believe that these recommendations are consistent with Chapter 1, Section 1.026(b) of the Wisconsin Statutes (1985-1986) which transferred lands owned by the State to the National Park Service, requiring that the transferred lands on several islands, including Basswood, be managed to "...to preserve their unique primitive and wilderness character..."

1. Another addition requested by the Sierra Club is Sand Island. We urge that two-thirds of Sand Island be designated as wilderness and one-third be designated for cultural interpretation of human uses of the Apostle Islands prior to establishment of the national lakeshore. Sand Island represents an especially rich opportunity for historical and cultural interpretation, given the concentration there of sites representing most phases of Apostle Islands history

The Sierra Club also concurs with the concept of historic wilderness in the *Shared Vision*. Such areas include the historic light stations, Manitou and Hokenson Brothers fish camps, quarries on Basswood and Stockton islands, fishing and tourist cottages on Rocky Island and sites on Sand Island. The management and interpretation of these sites should emphasize mingled stories of human and natural history as expressed in the physical landscape, while always respecting the surrounding wilderness context.

The Sierra Club also endorses the *Shared Vision* stressing limits on development throughout the islands. Undeveloped lands not designated as wilderness that lie outside the vicinity of historic sites throughout the Park should be managed for their wilderness values, with a continued prohibition on mechanized access.

The Apostle Islands National Lakeshore could be the proving ground for the concept of historical wilderness explained so well by William Cronon in "The Riddle of the Apostle Islands," May-June 2003 *Orion*. We join Professor Cronon in asking the National Park Service to carefully consider: "How do you manage a wilderness full of human stories?" (p.1) We endorse and ask that the Park Service heed the important observations and ideas embodied in these excerpts from that article:

"The heretical notion that one might actually wish to protect and interpret a cultural resource in the very heart of wilderness so as to help visitors better understand the history of that wilderness is pretty much unthinkable under current regulations." (p.4)

"Apostle Islands National Lakeshore is and always will be a historical wilderness: for centuries in the past, and presumably for centuries still to come, human beings have played and will play crucial roles in these islands. Visitors should come away from the park with a deepened appreciation not just for the wild nature they find here, but for the human history as well." (p.5)

Response to Sierra Club

1. Please see response 2 to PEER.

“The interpretive framework that can best integrate the natural and cultural resources of this park is James Feldman’s concept of ‘rewilding’: ‘rewilding landscapes should be interpreted as evidence neither of past human abuse nor of triumphant wild nature, but rather as evidence of the tightly intertwined processes of natural and cultural history.’” (p.5)

“The default management assumptions should be that existing human structures and artifacts will not be removed even from designated wilderness. No erasures should be the rule except where absolutely necessary.” (p.6)

“An NPS commitment to interpreting all phases of Apostle Islands history would mean more than just tolerating the presence of romantic ruins in an otherwise wild landscape.” (p. 6)

“Think of wilderness in the Apostle Islands as existing along a continuum, ... from areas that will be treated as ‘pure’ wilderness (even though they are full of historical artifacts that should not be removed) to highly developed sites like the lighthouses that are managed almost entirely for nonwilderness values.” (p. 7)

“Sand and Basswood islands are the obvious candidates to be designated as historical wilderness.” (p. 7)

“Management policy in the National Lakeshore should seek to protect wilderness values and historic structures, certainly, but it should equally protect stories- stories of wild nature, stories of human history. It is a storied wilderness.” (p. 7)

The ongoing story of the “rewilding” of the Apostle Islands should be part of the interpretation provided by the Park Service.

The Sierra Club has written extensively in the past about the natural and cultural features that make the Apostle Islands so unique and worthy of national protection. (Comment letters by SC-JMC of Aug 8, 2002 and July 13, 1989 and national Sierra Club Board of Directors, July 19, 2002.). Today’s comment letter builds on these earlier letters and makes more specific our proposal for wilderness designation of the Apostle Islands.

Thank you for considering our comments. Please contact us when additional follow up is needed.

Sincerely,

Gary Werner, Chapter Conservation Chair



THE WILDERNESS SOCIETY

October 16, 2003

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

Dear Sir:

The Wilderness Society would like to thank the National Park Service for the opportunity to comment on Draft Wilderness Study at Apostle Island National Seashore. TWS has a special relationship with the Apostle Islands because of Senator Gaylord Nelson's, our Senior Advisor, involvement with the enabling legislation for the National Seashore. Therefore we hold especially dear this piece of property that he had the foresight to protect. Apostle Island National Lakeshore is a magnificent unit of the National Park Service with its 21 island jewels and 12 miles of shoreline along Lake Superior at the northern most tip of Wisconsin. The park is remarkable for its pristine stretches of sandy beaches, wave-formed rock and cliff formations with caves and arches interspersed between coves and beaches.

Since the inception of the Park, the islands have been managed for its wilderness character. With the current Wilderness Study/Environment Impact Statement underway, we are excited to be moving forward with a robust wilderness recommendation for the islands. TWS strongly urges the expansion of Preferred Alternative C to protect more wilderness by including Basswood Island. Please recall that the Park Service accepted certain stipulations when several of the islands were donated by the state of Wisconsin to the American public for creation of the lakeshore. The state legislature authorized the donation of Oak, Basswood, Stockton and Michigan islands to the federal government but required that "the Apostles be managed in a way that preserves the island's unique primitive and wilderness character" (Wisconsin Statutes 1,026 (1)(b)). Therefore, we believe the Park has legal, if not moral, obligation to recommend Basswood as suitable for wilderness designation.

Over the summer series of conversations between parties interested in the designation of wilderness at Apostle Islands resulted in a consensus document referred to as a "Shared Vision". The Vision supports the inclusion of Basswood in the wilderness designation with the exception of the quarry at the southern tip and the dock on the westside of the island. TWS believes exempting the dock and quarry on the southernmost tip of the island will allow Basswood's wilderness characteristics to be effectively protected and

permit continuing access to the island. These exemptions are consistent with exclusions elsewhere in the alternative. They include docks, fishing camps and historic structures such as the lighthouses found on the islands. It is also important to note that the proposal would not limit existing motor boat access around and between islands. No part of Lake Superior itself would be in wilderness and no existing docks would be removed or allowed to fall into disrepair.

Furthermore, over the years Sand Island has been managed to protect its wilderness character despite the concentration of structures on the island. Therefore it seems reasonable that the Park's preferred alternative does not include this island in its recommendation for wilderness. Despite this we would strongly urge that Sand Island continues to be managed as a wild landscape and that no additional development be allowed.

Last but not least, in recognition of former Senator Gaylord Nelson, author of the bill that designated Apostle Islands as a National Lakeshore, champion of wild places, and Senior Advisor to The Wilderness Society, we respectfully request that the National Park Service name this wilderness the Gaylord Nelson Apostle Islands Wilderness Area when it is formally designated.

Sincerely,

Susan H. Gunn, Ph.D.
Director National Parks Program
The Wilderness Society

October 16, 2003

National Park Service
Apostle Islands National Lakeshore

Comments Regarding Wilderness Designation

1. As local residents living on the south shore of Lake Superior, we oppose the wilderness designation of the Apostle Islands National Lakeshore. One of our greatest pleasures is visiting the island beaches in our motor boat. They say this will not change, however, as Dave Sorenson so aptly noted in his recent commentary to the Daily Press, "the Wilderness Act specifically prohibits certain uses and developments, such as motorized equipment..." Certainly there are many people who enjoy this same privilege and want it to remain as is. The Town of Russell and the Bayfield County Board members DO represent the "local population" and therefore have voiced their opposition of the wilderness proposal. The Republican and Democratic political parties, the League of Women Voters, the Monday Club, etc., DO NOT represent the majority of those people closest to the islands.

Betty Good
Raspberry Bay
Town of Russell

Response to Betty Good

1. As we noted on p.26, the waters of Lake Superior were determined to not be suitable for wilderness designation. The text further states that the beaches on the islands below the high-water mark are not included in the wilderness proposal. Thus, none of the wilderness alternative proposals being considered in this study would affect motorboat access to the islands – if the NPS preferred alternative is adopted by Congress and wilderness is designated in the park, you will continue to be able to visit the island beaches in your motorboat.



Harold C. Jordahl, Jr.

21 S. Segoe Road
Madison, WI 53705
(608) 238-1087

9-10-03

Wilderness Study Coordinator
A. I. N. L. Route 1, Box 4
Bay View, WI 54814

I support designation of the A.I.N.L.
as an addition to the National Wilderness
System with the following caveats:

1. I support the document title "Shared
Visions" which was developed & agreed to by a
Citizens group with a deep interest in the
matter

2. Attached is a copy of a letter to
Gaylord Nelson of the Wilderness Society
(6-3-03) which outlines in some detail
my recommendations that Basswood
Island be included in the Wilderness
Designation with several exemptions

Sincerely
Harold C. Jordahl

A Shared Vision
for Protecting the Rich Cultural Heritage
and Remarkable Natural Features
of the Apostle Islands

Why A Shared Vision?

As the only National Park Service managed unit wholly within the boundaries of Wisconsin, the Apostle Islands National Lakeshore represents a uniquely valuable natural, recreational, historic, and scenic resource for the people of the state, the region, and the nation. The recommendations in this Shared Vision document seek to recognize, celebrate, interpret, and preserve these beautiful islands for all Americans and for all generations to come.

Supporters of this Shared Vision urge the National Park Service, Congress, and the President to act in a timely manner to reaffirm and strengthen Public Law 91-424, which created the Apostle Islands National Lakeshore for the "protection of scenic, scientific, historic, geological, and archeological features contributing to public education, inspiration, and enjoyment" and the "preservation of the unique flora and fauna and the physiographic and geologic conditions now prevailing on the Apostle Islands within the lakeshore." New legislation should formally designate as wilderness—the highest form of protection that any land can receive in the United States—the extensive portions of the park that so qualify, while also strengthening the mandate to interpret Apostle Islands history at appropriate locations and affirming ongoing recreational uses of the park.

Goal I: Apostle Islands Wilderness

To ensure that all appropriate and qualifying lands within the National Lakeshore are given the deserving protection of wilderness, this Shared Vision endorses Alternative C of the National Park Service Draft Wilderness Study and Environmental Impact Statement with the following modifications.

In recognition of its existing wilderness values, Basswood Island should be added to the proposal with the following exclusions:

- 1) At the dock on the west side of the island, including the existing campground development (consistent with similar exclusions elsewhere in the islands);
- 2) At the southern tip of the island south of an east-west line just north of the Bass Island Brown Stone Quarry.

1.

We believe that these recommendations are consistent with Chapter 1, Section 1.026(b) of the Wisconsin Statutes (1985-1986) which transferred lands owned by the State to the National Park Service, requiring that the transferred lands on several islands, including Basswood, be managed to "...to preserve their unique primitive and wilderness character..."

Goal II: Apostle Islands History

In addition to protecting one of the nation's most beautiful wild landscapes in a region that has few areas of designated wilderness, a key mission of the National Lakeshore is to interpret the human and natural history of the Apostle Islands. Certain areas have been excluded from the designated wilderness both to facilitate the preservation of important historic sites and artifacts, and to encourage a wider range of interpretive possibilities than designated wilderness typically permits. These areas include the historic light stations, Manitou and Hokenson Brothers fish camps, quarries on Basswood and Stockton islands, and fishing and tourist cottages on Rocky Island. Sand Island represents an especially rich opportunity for historical and cultural interpretation, given the concentration there of sites representing most phases of Apostle Islands history. The management and interpretation of these sites should emphasize mingled stories of human and natural history as expressed in the physical landscape, while always respecting the surrounding wilderness context.

2.

Goal III: Limits on Development Throughout the Islands

This Shared Vision recommends that undeveloped lands within Apostle Islands National Lakeshore be managed so as to maintain their natural, wild, and primitive character. Aside from the stewardship and interpretation of existing historic resources outside the designated wilderness according to the principles articulated in Goals I and II above, and aside from locations already developed for recreational purposes (which should be maintained to serve their current uses), new developments on the islands should be limited to wilderness-style trails and campsites. Undeveloped lands not designated as wilderness that lie outside the vicinity of historic sites throughout the Park should be managed for their wilderness values, with a continued prohibition on mechanized access.

Conclusion

Supporters of this Shared Vision document believe that the strategies we've outlined here represent the best way to ensure the public's continued enjoyment and appreciation of the cultural, recreational, natural history, and scenic values which Apostles Islands National Lakeshore was originally created to preserve. We hope all who share our views will join us in working to assure that these extraordinary islands continue to be protected and managed for the benefit of all Americans.

AGREED (July 12, 2003):

Martin Hanson, Mellen WI	Hank Martinsen, Ashland WI
William Cronon, Madison and Bayfield WI	Carolyn Sneed, Washburn WI
Rebecca Rom, Minneapolis MN	Harold "Bud" Jordahl, Madison WI
Jeff Rennie, Bayfield WI	Ron Way, Minneapolis MN

Endorsed by the Friends of the Apostle Islands National Lakeshore (July 31, 2003)

Responses to Harold Jordahl

1. Although the Wisconsin legislature directed that the lands it transferred to the federal government, including Basswood Island, be managed to preserve their "unique primitive and wilderness character," there is not a requirement that the islands be designated as wilderness in order to fulfill this direction – the National Park Service could administratively manage Basswood Island to protect its wilderness values without proposing the island for wilderness designation.
2. Although we expect that new developments would be limited on the islands, the wilderness study is not the appropriate process to determine what, if any, developments should be permitted and where they should be located. See also responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, and responses 1 and 4 to Brandt Mannchen.



June 3, 2003

Gaylord Nelson
The Wilderness Society
900 17 St. NW
Washington, D.C. 20006-2596

Dear Gaylord:

Thinking about "wilderness" for the Apostle Islands brings back many memories. I was hiking and camping on the islands in the 1950s. In the winters we snowshoed on the islands to monitor deer conditions. In 1953 after an extensive survey, I re-introduced marten to Stockton Island (unsuccessfully). And, of course, in the 1960s, we put substantial effort into dealing with the lakeshore issues.

Given the mix of legal and administrative rules which govern the National Park Service, wilderness designation for the islands is somewhat complex. My brief answer, however, is to agree with the NPS and leave Sand Island out of the wilderness.¹ I'm satisfied with the small exceptions for lighthouses on the other islands and the Stockton Island exceptions.² With caveats, I believe Basswood Island should be wilderness. I will elaborate in the following paragraphs.

¹ Since writing this, Becky Rom called and Becky, Bill Cronan and Bob Krumenaker have agreed to recommend Sand two-thirds wilderness and one-third for cultural interpretation. I agree.

² Stockton represents what can happen. In the 1950s, I camped at the abandoned fish camp at Presque Isle Point, a delightful mix of cultural history and new islands forests. The Conservation Department subsequently acquires the island (a marvelous achievement) and immediately spends some \$80,000 on a large obnoxious breakwater and dock, and installs pit toilets, and a campground; later came an NPS ranger station and interpretative building. The developments encourage visitors, especially sail boats looking for safe dockage. The mystique and the cultural history is largely gone although to the credit of the NPS, a small portion of the fish camp is maintained and interpreted. The short hike to Julian Bay is lovely, although over used, and the signing could be deleted by providing the visitor with a brief brochure locating interesting geologic and botanical sites and let them make the "discovery". At Quarry Bay, my favorite little cove on Stockton, there is now a group campground, picnic tables, toilets, fire pit and a dock. The beauty and quietness of the cove is gone. All told, that portion of Stockton is changed, probably forever.

Department of Urban and Regional Planning

Old Music Hall University of Wisconsin-Madison 925 Bascom Mall Madison, Wisconsin 53706-1317
608/262-1004 Fax: 608/262-9307 www.wisc.edu/urpl/

I concur with Cronan's position that cultural history is important. But where do you draw the line? My 220-acre farm, inhabited by Europeans for about 100 years, had "artifacts" littering the landscape. In fact, some areas were little more than junk piles. I removed the bulk of the junk, leaving a couple of horse drawn wagon wheels and a rusting disc tucked in an aspen grove as reminders of "what was". With a map, a visitor can locate the earthen depression of the first log cabin (circa 1860) adjacent a spring and a former trail and then a now-abandoned public road. When I serve as guide, I spend more time explaining the land-use history which in turn accounts for the differing forest composition, than I do on natural history. Guests are awed when they visualize and understand the results of natural processes albeit influenced to a degree with my modest attempts to guide those processes. Visitors with a more intense interest are shown the first aerial photographs (1937) with those of today. The differences are dramatic. (about a 40-percent increase in forest cover)

How does this apply to Apostles? Excluding a portion of Sand Island will permit the NPS to interpret European culture typical on many of the other islands (except for a brownstone quarry.) To my knowledge, there is little of great archeological significance on Sand or the other islands except for remnants on ancient glacial lake, beaches, and more human artifacts on present shorelines.³

3. Basswood Island is close to Bayfield and Red Cliff and highly vulnerable to over development and interpretation. It should be "wilderness." Although I am not favorable, a few acres of the

Continues next page

³ My proposal to include a minimum of 40 acres at LaPointe for a national historical monument was included in the early lakeshore proposal. It was dismissed out of hand by a NPS historian who stated it had no significant national value. Fighting on a dozen different fronts to maintain the integrity of the overall lakeshore proposal, I decided not to take on the historian in Philadelphia. Moreover, I did not have the knowledge to argue with any persuasiveness, nor did I have a cultural historian on my Interior Committee to challenge the conclusion. Today, much of LaPointe's great value has been destroyed by harbor dredging, a marina and associated developments. However, one can grasp the archeological significance of the village by visiting the State Historical Society's museum, which incidentally we owe to the generosity of the Caspers who were great lakeshore supporters. Sand Island is easily accessible, still has artifacts and remnants of early white culture and lends itself nicely to historical interpretation. In fact, if the NPS has the money, it would be nice but not necessary to keep some of the old farm fields open and in agricultural crops typical of yesteryears practices (more on this later). As a caution, I urge the NPS to exercise extreme care and sensitivity on Sand Island and not to overinterpret with signs, trails and building preservation. The bulk of the acreage should revert naturally to "wild conditions" or as Cronan/Feldman say "rewilding").

3. While we agree that Basswood Island is suitable for wilderness designation and understand the concerns about future pressures for development, we believe there are justifiable reasons for not including the island in the NPS wilderness proposal. See response 2 to PEER and response 1 to the National Parks Conservation Association.

McCloud farm could be selected to illustrate island homesteading. Thus, the visitor would grasp the shifting and changing human use over time on the entire island. Yes, there are constraints in the 1964 Act and perhaps in the 1975 Act and NPS regulations. A little creative interpretation of these rules would be necessary instead of standing firm on rigid national regulations. I have visited with Becky Rom on several occasions on these matters. I've read Cronan's material and believe he can do these things within existing parameters. If NPS is adamant, let's add a few words to the wilderness designation making cultural history interpretation possible. Also, keep in mind that the Apostle Islands Act requires that historic features are to be protected. It's nonsense, of course, to destroy any cultural resources on this or any island which tell important historical stories. If NPS is rigid, the McCloud farm could be excluded from the rest of the island, but I do not prefer this option. Stone fences and old foundations, though overgrown with vegetation, will still tell the story.

Cronan makes the point that cultural resources should not be destroyed. With caveats, I agree. Unfortunately, some which are now gone, should have been protected. Another example, The Coast Guard, which in my experience looks at the world through a myopic lense, used a helicopter to lift the historic small light from the western end of Long Island and crumpled it into the adjacent scrub oak and jackpine. This was the only light of its kind in the Great Lakes system. Even with the help of Dave Obey they beat us. Subsequently, I urged NPS to put the pieces together and re-establish it near the original location. It would be a nice historic contrast with that obscene phallic blue tube which they erected and which now automatically emits light to caution boaters. I do not know if anything was done. I might add that the Long Island lighthouse is on the national register.

Keeping Basswood wilderness would still permit the NPS to have a brief interpretative brochure and map available on the boat dock which would identify the location of cultural artifacts. But, please, please, I say no to signs on trails; let the hikers have some sense of discovery when they locate an artifact, and even a greater sense of discovery when they trip, stumble and fall over an

unmarked, rusted farm implement in the interior forest.⁴ Lastly, Basswood, to my knowledge, has no cultural resources that are unique and significant to the entire archipelago. Sand Island represents the typical situation.

All the islands are vulnerable; Basswood even more so. Outdoor recreation technology has changed dramatically. Remember when we were planning the lakeshore the following was the case; sailboats were few; snowmobiles were in their infancy; sea kayaking was unknown, snowshoeing was for foresters, "landlookers" and biologists; cross-country skiing was unheard of; jet-boats did not exist; wind surfing was yet to come; dogsled excursions to the islands was never envisioned; scuba diving; shipwreck exploration was in its infancy and kite sailing was unheard of. What's next on the part of challenged and oft-times affluent outdoor recreationists and even more challenged engineers and manufacturers who see new ways to make lots of money with new equipment sales? The ingenuity of the human mind coupled with the profit motive can easily make any informed projections we make obsolete. When we were writing the legislation, even with plenty of help from many disciplines, we simply could not visualize the future. Perhaps personal aircraft will be next on the scene, and then what? And as Becky Rom points out, leaving Basswood out of wilderness will put even more pressures on it for development.

For financial and perhaps legal purposes, cultural protection, rehabilitation and interpretation on all the islands is not realistic. (Over a 35 year period, I know the labor involved and the cost of maintaining even small openings on my revegetating farm. And it never ends.) While not as exciting as stumbling across an old piece of rusting farm or logging equipment tucked among island corners, a visitor can grasp the human and ecological history of the islands by spending several hours in the Northern Great Lakes Visitor Center a few miles west of Ashland. I spent seven long years working on that project and recall very well the sometimes bitter arguments we had over historical preservation.

⁴ I remember going through the badlands with my family – my wife and four children – on the NPS interpretative and scenic road. Half way through, all of us were sated and kids began to wonder when we would get home. During the 6600 car trip to the southwest and west coast we had perhaps reached our limits. A brief video or a short summary in a colorful brochure would have sufficed leaving us to look with eyes that now had some minimal understanding of geological forces and having the excitement of "discovering" them. Those images and the "discovery" will last longer in our memories than a sign telling us what we are looking at.

Economic interests wanted a romanticized version and a current visual image of vast, lovely untouched "virgin" forestlands. I insisted on an honest representation of a great tragic natural resource and human history. A visitor can make their own judgment on how well we do with a thoughtful visit to the Center. I am delighted that the Center now receives 110,000 visitors annually, and the numbers are increasing.

I am also excited with a new project which the Center is undertaking. Briefly, plans are to "prepare a multi-dimensional indoor-outdoor exhibit that will trace the landscape sequence of cultivation and ethnicity of Wisconsin's Lake Superior region, using maps, imagery, narrative and expressive site elements". Collaborators include Dr. Janet Silbernagel (U of W-Madison, Dept. of Landscape Architecture) and her associates Arnold Alanen (U of W-Madison, L.A.); Ruth Olson (U of W-Madison, Center for Study of Upper Midwest Cultures), Joseph Rose (Northland College, Native American Studies), James Leary (U of W-Madison, Folklore Studies). This team will demonstrate ethnic history and cropping and horticultural plant practices on the Center grounds.

At the present time Steve Hoecker, Center Director, advises me that the historic dairy barn (1917) needs a new roof. To maintain the integrity of the barn, the issue is whether the roof can be metal or cedar shakes. This is great because I argued that the barn and adjacent fields be protected and interpreted as an important part of the Northern Great Lakes cultural history. The Forest Service's first thoughts were to raze the barn.

There is another example of cultural interpretation. I am encouraged with the USFS beginning steps to hire archeologists to identify and protect cultural resources on the national forests, including the nearby Chequamegon. For example, Susan Nelson, USFS, Park Falls, initiated a modest study and wrote a report of a Swedish farming community just south of Grandview, a few miles from the Center. This report is available to Center visitors. Other museums which should be noted include those at Ashland, Cable, Washburn, NPS headquarters in Bayfield and the State Historical Society on Madeline Island.

A basic understanding of the history of the region can be gained by visiting these sites and then with a visit to the islands "discovering" a cultural artifact and understanding the reasons for a "new" young forest. Then the visitor can think through the dynamics of shifting and changing social structure, economics, technology and plant succession, all of which becomes a great personal experience. A sign at a cultural site which attempts to tell a story is a poor substitute.

In summary, Sand Island is highly suitable for modest and sensitive island interpretation; a brownstone quarry can be easily viewed along STH 13 south of Bayfield (perhaps a turnout is necessary), at the tip of Basswood Island (some tree clearing necessary to see it from a boat). Because the Basswood quarry is in the national register, some special measures may be helpful – a brochure and modest trail perhaps, but no more. There are other quarries on other island sites. Furthermore, there are millions of other public lands in the Northern Great Lakes where land use can be interpreted and managed to reflect cultural history. In fact, there are additional potentials on the doorstep of the Apostle Islands at the Center. The barn could house a few cattle, along with a modest agricultural museum. Early crop practices will be demonstrated on the land which is still in fields. (The house has no historic value.)

We have small bits – postage size bites – of "wilderness" in Wisconsin and the Eastern U.S. Let's seize this opportunity to add to this modest legacy.

Sincerely,



Harold C. Jordahl, Jr.
Emeritus Professor



"Judziewicz, Emmet"
<Emmet.Judziewicz@u
wsp.edu>

To: <apis_comments@nps.gov>
cc:
Subject: Comments of APIS draft wilderness study and EIS

09/07/2003 03:34 PM
EST

Robert Krumenaker
Superintendent, Apostle Islands National Lakeshore

Dear Bob,

I received the Apostle Islands National Lakeshore Draft Wilderness Study/EIS and would like to add my comments to the public record.

First of all, I am glad that the study is finally complete and that we may be moving towards designating a significant part of the Lakeshore as federal wilderness. On a personal level, I worked with Mike Van Stappen over the years and know that this issue was near to his heart and one that he did a lot of work on. He would be pleased, I think, to see that progress is being made.

Your choice of Alternative C is a good start, but I think it is insufficient to preserve the unique biodiversity of the Lakeshore. Several critical areas are left out that should have been proposed for wilderness protection:

1. Long Island and that part of Chequamegon Point that is included in the National Lakeshore. This dynamic barrier island/spit system is an absolutely unique natural feature in Wisconsin and one that is uncommon and endangered elsewhere in the Great Lakes region. I'm sure you are aware that it is one of the few breeding grounds for the federally endangered piping plover in the Midwest.

I was informed by Tom Doolittle that one reason that Long Island and that part of Chequamegon Point that is included in the National Lakeshore were not included within the preferred alternative wilderness area is that the Bad River Band of the Ojibwe tribe claims to own this land outright by treaty. This may or may not be so and is a matter that will surely eventually be adjudicated by a court. Even if the decision goes against the Park Service, it will at least settle the matter. I hope that you will find the strength to hash this problem out during your tenure as superintendent; someone will eventually need to fall on this particular "grenade."
2. The Stockton Island double tombolo at Presque Isle Point. This is another unique feature in the entire Lake Superior region. The present campground at Presque Isle precludes any re-establishment of a natural fire regime on the tombolo that would maintain the present red pine forest and savanna. The campground should be moved to a less sensitive area, say "Anderson Bay" a mile or two to the west; that would allow the tombolo to be designated as wilderness, and natural processes to operate.
3. Sand Island. I fully understand that this island is heavily utilized by kayakers and day visitors and that the fine historic building along the east coast, especially at Shaw Farm, need to be protected. However, there is no reason that 80% of Sand Island - say all of it except a 1/4 mile wide strip on the east coast from the Lighthouse to Shaw Farm - could not be designated as wilderness. The West Bay Club, when I visited it in 1992, was in a ramshackle condition and is probably in worse condition now. Is there any serious possibility that the Park Service will find funds to stabilize, let alone renovate this structure? I seriously doubt it. Designate the

Continues next page

Responses to Emmet Judziewicz

1. Although we agree that Long Island is a special natural feature and deserves protection, that is not, by itself, a sufficient reason for designating the island as wilderness. The island is currently administratively protected as a natural area zone in the park's current *General Management Plan* and we do not foresee this changing. With regard to the piping plover and Bad River Band claim on the island, see response 3 to PEER, response 8 to the Friends of the Boundary Waters Wilderness, and response 9 to Brandt Mannchen.
2. See response 6 to Friends of the Boundary Waters Wilderness. The question of whether the campground on Presque Isle needs to be moved is beyond the scope of this study. We would consider the need for this action in a future management plan.
3. We believe there are good reasons to not include Sand Island as wilderness. See response 2 to PEER.

westernmost 80% of Sand Island as wilderness and let the West Bay Club decay back to nature, as you are doing with, for example, the Bear Island and Outer Island logging camps.

I was glad to hear that Eagle Island and the Outer Island sandspit will be included in the wilderness area under Alternative C and that their exclusion in the EIS was simply a typo.

For all of these reasons, I strongly support a modified Alternative B, which would preserve about 90% of the Lakeshore federal wilderness. I do agree with Alternative C, however, in that I believe that Basswood Island can be "sacrificed" to light development such as, perhaps, expanded docks and campgrounds.

I look forward to following the wilderness designation process.

Sincerely,

Emmet J. Judziewicz
Assistant Professor of Biology
Director, Robert W. Freckmann Herbarium
CNR 301
Department of Biology
University of Wisconsin-Stevens Point
Stevens Point, WI 54481
(715)-346-4248
<emmet.judziewicz@uwsp.edu >

Visit our new web site devoted to Wisconsin Plants at
<<http://wisplants.uwsp.edu> >



"Maureen Kinney"
<Maureen@johnsflaherty.com>

08/05/2003 02:39 PM
EST

To: <APIS_Comments@nps.gov>
cc:

Subject: I am concerned that the new designation of wilderness for the
apostle islands national lakeshore wil

1.

I am concerned that the new designation of wilderness for the apostle islands national lakeshore will outlaw the possession of pets on boats and on shore(even leased as now required). I believe that this would be one very undesirable result of wilderness status. I also have concerns that the new status may result in limiting hunting, and or fishing opportunities within the park.

Response to Maureen Kinney

1. Wilderness designation would have no effect on the possession of pets on boats or on shore, although the current requirement to keep pets leashed on the islands would apply in both wilderness and nonwilderness areas. Wilderness designation also would have no effect on hunting or fishing opportunities in the park, as noted on p.5.



"John C. Laney"
<manannan@citizens-t
el.net>

To: <APIS_Comments@nps.gov>
cc:
Subject: Apostle Islands

09/02/2003 03:36 PM
EST

Dear Sirs:

The wilderness designation is the most restrictive land use classification. According to the 1964 Wilderness Act it would be applied to "an area where earth and its community of life are untrammelled by man."

That certainly doesn't apply to the Apostle Islands which have been lived on and used by people for thousands of years before Europeans came in the 1600's. After that the emigres and their descendants farmed, fished, lumbered and built fishing boats until the NPS took over management of most of the islands in recent years.

Despite the ethnic cleansing practiced by the U.S. before and especially after the Civil War, the indigenous people still live here, as do the offspring of the immigrants. Their life is not easy now that lumber, mining and railroad industries have left the area and government management practices have made commercial fishing very difficult. Tourism and service are now viable industries and hold the promise of more jobs for the future.

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| However, applying the wilderness designation to the Apostle Islands would have the effects of reducing access and recreation, and cost jobs to the local community. |
| It would also be anti-management and anti-good stewardship by leaving the islands vulnerable to the blowdown of timber as happened in 1999 in the Boundary Waters and the area just east of Ashland. Because of the wilderness designation in the Boundary Waters, cleanup could not begin and a huge area was left open to the possibility of uncontrollable forest fire and/or insect infestation. |
| The entire notion of a pristine wilderness - untouched, pure, virgin nature - is a 19th century fantasy... and profoundly mistaken.
The Apostle Islands are being managed all right now. Don't mess with them. Don't push for the wilderness designation. You could well end up hurting them and their people.
John C. Laney, Ph.D.
S/V Manannan, Erickson's Boatyard
Bayfield, WI |

Responses to John C. Laney

1. As noted on p.19, none of the alternatives in this study would affect access to the park by currently legal means. The impact assessment notes that there would be some impacts on recreation, such as opportunities to picnic, and limits on the potential for expansion of recreational facilities. But most visitors' recreational activities would not be noticeably affected. We also disagree that local community jobs would be adversely affected by wilderness designation for the reasons stated on pages 19-20.
2. Timber blowdowns, wildfires, and insect infestations are naturally occurring events that could occur on the Apostle Islands whether or not wilderness is designated. It is true that wilderness would limit what could be done on most of the islands if a timber blowdown were to occur – under NPS policies all actions taken to suppress wildfires would be required to use the minimum requirement concept and be conducted in such a way as to protect natural and cultural features and to minimize lasting impacts of the action. But this condition does not rule out taking actions to minimize the possibility of an uncontrolled wildfire or insect infestation due to a blowdown. (Section 4(d)(1) of the Wilderness Act specifically provides for measures to be taken as may be necessary to control fire, insects, and diseases.) It is also worth noting that due to logistical, financial, and policy constraints, it would be extremely difficult to clean up a blowdown on the Apostle Islands even if the islands were not designated as wilderness.
3. Wilderness can be designated in areas that are not pristine. See response 1 to the Izaak Walton League, response 3 to Citizens Against Apostle Islands Wilderness, and response 2 to Celeste Peltier.



ml
<ml@iexposure.com>
10/16/2003 11:06 AM
CST

To: <apis_comments@nps.gov>
cc:
Subject: Public Comment

An Apostle Island Wilderness?

1.

I recently discovered, to my astonishment, that the National Park Service has, for the last few years, been soliciting comments on creating a new wilderness area. This is astonishing to me because I live within 300 miles of the area and have not heard a thing about this proposal. I consider myself well informed and get my news from a variety of local and alternative sources and maybe more importantly, I am a wilderness enthusiast and receive information directly from environmental groups. While I applaud the attempts at getting public comment and holding local forums for discussion around the proposed area, a greater effort is needed by the National Park Service, advocacy groups and others to get input from wilderness and park users from across the country since this is a national land use issue. An especially important group to reach out to for comment would be the constituents who may visit the new wilderness, especially those who currently explore other already designated areas in the wilderness preservation system who may have written off the Apostle's as not being a wilderness. I may have simply missed this one issue although after reading the article in Orion Magazine by William Cronon I visited the official web site for the project and found that only 5,000 comments were received the first year in 2001 and 1,800 in 2002, and those appeared to come from mainly the local pro-motor camp, so it appears that many others 'missed' the issue as well. Even with all the support from the motorized lobby the National Park Service is saying 80% of the comments were in favor of wilderness protection although it appears they want a wilderness with noise.

2.

Is a motorized wilderness really a wilderness? Will it weaken the whole wilderness protection system? The National Park Service says that Lake Superior is not protectable under the Wilderness Act so it has to allow motors around the islands. It is my understanding that the Wilderness Act cannot allow motors under its guidelines. So we are seemingly in an impossible situation, people want motors and wilderness together. We only need to look at the Boundary Waters Wilderness in Minnesota to see the motorized question has been debated for many years and it is not an 'all or nothing' answer. Motors are allowed there, unfortunately, in some areas. These areas are very limited and occur on the edges of the wilderness thus still preserving a continuous motor free wilderness. I propose a compromise on motors that will preserve both the wilderness act and the wishes of the pro-motor constituents to insure the area receives wilderness protection. Let us keep in mind that each situation is unique when considering land use issues for land is unique.

In the Apostle Island's we are given a situation of inner and outer islands. Let us work out a plan to actually achieve a real wilderness feel for at least the core areas, like the boundary waters, and not allow motors to the inner islands and create a motor free 'path' to the inner area so the canoes, kayaks and other potential nonmotorized access devices can at least have an 'untrammelled' access. One nonmotorized path could be between York and Oak Islands extending north-east to North Twin and Cat Islands.

I support Maximum Wilderness here and in any location that it is even remotely possible. Why? We live in a world of urbanization and noise that is so complete many of us must travel for hours and hours to get anywhere that even looks, feels and sounds like it might be wild or contain an intact ecosystem. Our impacts are felt everywhere. William Cronon pleads for saving 'romantic' structures and interpreting the failures of peoples attempts at

Responses to ML

1. The National Park Service has sought public input throughout the wilderness study process, and has provided numerous opportunities for the public to participate. We published newsletters, held public meetings and workshops, and used the Internet extensively to inform people about the study. In addition, the study was publicized by the local and state media. During the course of the study we received comments from across the country as well as from many local residents. The vast majority of the comments we received were in fact supportive of wilderness designation. Please see pages 103-105 for a summary of all the efforts that were made to publicize the study and solicit comments before the draft document was published, and in this document see the section titled "Public Review of the Draft Wilderness Study / Environmental Impact Statement," which identifies all the public meetings (and one hearing) that were held after the draft document was published.
2. As we noted on p.26, the waters of Lake Superior were determined to not be suitable for wilderness designation. Your proposal to designate motor-free paths to the inner islands is not an alternative that we can consider. The state of Wisconsin has jurisdiction over the waters beyond the park boundary, so we could not limit motorboat use on the waters between the islands. Even if we could do so, such motor-free paths would be very difficult for visitors and managers to discern, making it difficult to enforce the prohibition on motors. The motor-free paths also would do little, if anything, to enhance the wilderness experience, since the sounds and views of motorboats would still be apparent in the areas outside the paths.

working against the lands ecology. While there is sure to be lessons learned from peoples attempts at making a living on the land isn't that what books are for? History books, biographies and many other genres contain important testimonies immortalizing the joys and hardships of peoples lives. Maybe the Apostle Islands need a good story teller to document the happenings, romantic and not so romantic, just like everywhere else in the world.

We have far too many reminders of humans quest to control and change the land and far too few examples of the ways that many peoples around the world existed in greater balance with the earth. There is human made junk on the moon, outer space, across the countryside and sprawling across every city around the world. If we were to try to salvage and interpret all of human civilization we would have interpretive signs and markers in virtually every inch of land on earth. Think of all the events, historical facts and artifacts just in Europe alone, the entire place would be covered by signs and kiosks. I also find it interesting to look at a particular piece of the Earth and after discovering some artifact or odd feature ask, what happened here? However, I do not want a world where only humanities invention and mess is allowed to survive, and not God's creation and evolution. One old orchard in the Apostle Islands while it might be interesting to look at is not a cultural landmark. Many ancient orchards through out the world are destroyed every year by war and urbanization, some hundreds and even thousands of years old, not the decades or so of history in the orchards of the Apostle Islands. Does silicon valley have an interpretation of the huge groves and orchards that once existed there? What about the tribes and native life that flourished even before colonization and domestication radically altered the landscape?

Humanities legacy is to often about destruction and conquest over the environment and it's peoples. Shouldn't we restore as much as we can to it's intact legacy of ecological balance where some small remnant might survive to interpret more than just the last 100 or so years. What about eons of life that came before without motors, roads and modern convenience.

M.L

September 28, 2003

Mr. Bo Krumenaker
Superintendent
Apostle Islands National Lakeshore
Attention: Wilderness Study
Route 1, Box 4
Bayfield, Wisconsin 54814

Dear Superintendent Krumenaker,

Enclosed are my personal comments regarding the Draft Wilderness Study (DWS)/Environmental Impact Statement (EIS) for the Apostle Islands National Lakeshore (AINL).

1) **On page v, Summary**, first paragraph, let us hope that a formal wilderness proposal will be submitted (not may be) to the Director of the National Park Service and that the Department of the Interior and the President will submit this proposal to Congress for its consideration. There is no doubt in my mind that lands in the AINL possess wilderness characteristics and are deserving of designation as wilderness. I support designation of wilderness on the AINL.

2) **On page vi, Summary, Alternative B**, I support the maximized wilderness alternative of 39,500 acres, which is about 57% of the entire park (lands and waters) within its boundaries. People need more places they can go, without the sights, sounds, and use of mechanized civilization so they can get in touch with their connection to Nature and to their own being. Such places provide for physical, spiritual, and mental well being not found elsewhere. Please note on page vii, Summary, Environmental Consequences, that "No impacts were identified due to wilderness designation that would require mitigation measures."

1.
- 3) **On page ix, Summary, Visitor Nonwilderness Experiences**, other than removal of several picnic tables, what is the moderate, long-term, adverse impact on visitor' nonwilderness experiences that wilderness designation will have. NPS states in several places in this DEIS that "managers' flexibility to expanded recreational and interpretive facilities into new area" will be affected. However, NPS never quantifies this supposed impact and never says where this will occur and what facilities will be impacted. NPS needs to be more definitive about this impact. It is not clear why NPS cannot use brochures and other informational devices in place of signs to gain the understanding of the park and its significance that NPS says will be harmfully impacted.

4) **On page 5, Uses and management in Wilderness**, it is not clear to me how much activity NPS can conduct for fire management (fire suppression) and correction of past mistake or impacts of human use in wilderness. For instance, why would NPS want to suppress natural fire? This would be counter to allowing

Responses to Brandt Mannchen

1. It is not possible to quantify or to be more definite about the impact on managers' flexibility. As noted on pages 67-69, this study is not a management plan and is not intended to address questions regarding what facilities would be developed either in the wilderness or nonwilderness areas. However, for purposes of the assessment of impacts of wilderness designation it was necessary to generally examine possible management actions and developments that might and might not occur in the wilderness and nonwilderness areas. It was *assumed* for purposes of this analysis that some developments would be built in the nonwilderness areas, consistent with the park's current and future general management plans. Because it is difficult to know what development(s) might be built where, the potential consequences of the alternatives can only be analyzed in general terms using qualitative analyses. Future general management plans and implementation plans will address these questions in more detail and will have their own NEPA analysis documents.

With regard to the use of brochures and other information materials, we are not saying these media cannot be used to gain an understanding of the park and its significance in wilderness. But there would be fewer opportunities to use certain interpretive media in those areas that are wilderness, such as wayside exhibits or self-guided, signed interpretive trails, that could enhance visitors' understanding and appreciation of the park. As noted on p.90 of the draft, foregoing these opportunities could have a negligible to minor adverse impact on visitors experiences compared to alternative A where there would be no restrictions on the use of these media.

the ecosystem to be self-willed as required by the Wilderness Act. NPS does not have carte blanche to take such management actions. It is important for NPS to acknowledge its limitation in wilderness including humility to hold back and allow Nature a free hand and not conduct actions because they are easy to do.

5) On page 12, **Wilderness Study Process**, last paragraph, it is not acceptable to me, as an owner of the AINL, that the Secretary of the Interior recommend to the President no lands be recommended to Congress for wilderness designation. This option should not be considered because it is not necessary or appropriate for AINL.

6) On page 15, **Natural Resources (General)**, it is important for NPS to understand in this process that "Wilderness designation would not substantially affect either the management of natural resources, such as vegetation and wildlife in the park, or uses within the park that could affect these resources."

2. 7) On page 33, **Alternative C**, third paragraph, For Basswood and Sand Islands, if there are "some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands" why not remove these areas from wilderness and designate the rest of the island as wilderness? NPS needs to explain why entire islands must be nonwilderness if only a small portion may require interpretive facilities.

8) On page 28, **Alternative A**, I do not support this alternative. I want wilderness designated for the AINL.

9) On page 29, **Alternative B**, I support Alternative B because wilderness is a vanishing resource, there is too little of it, and it serves purposes that other, more common, types of public land management cannot serve.

3. 10) On page 33, **Alternative C**, second to last paragraph, what are the "valid rights" that NPS would continue to "honor and respect?"

4. 11) On page 34, **Alternative C**, what specific development is NPS taking about when it states, "and keep open the possibility of the island accommodating additional development to provide for increase use" for Sand Island, Rocky Island, and Stockton? Is the increased use desirable and what impact will it have? I do not support Alternative C.

12) On page 37, **Alternative D**, I am opposed to this alternative because it will allow too little wilderness and provides the opportunity for too much development.

5. 13) On page 37, **Alternative D**, what are the use and occupancy reservations on Bear Island?

2. As noted on p.33, alternative C strives to minimize the fragmentation of areas of wilderness or nonwilderness – the alternative tries to minimize small isolated pockets of wilderness or nonwilderness. It is much easier to manage an area and for visitors to know what they can and cannot do if everybody knows that most of an island is wilderness or nonwilderness. Additionally, it is not possible to know at this point in time if and where interpretive facilities might be located on the islands – keeping the islands as nonwilderness areas maximizes the flexibility of managers to locate interpretive trails or other media in the best locations. Finally, keeping the islands as nonwilderness retains the possibility of providing additional limited developments to accommodate increased use, such as day use picnic areas or a group campsite.

3. Several people have use and occupancy reservations, which will terminate in the near future, or life estates to cabins on Rocky and Bear Islands. There are nonfederal mineral rights outstanding on these islands. The Town of Russell also owns a tract of land on York Island. All of these landowners have legal rights that the National Park Service will respect whether or not wilderness is designated in the park.

4. It is not possible to specifically state in this study what additional developments, if any, would be provided, for the reasons noted in response 1. As stated on p.68, developments that *might* be considered on these islands include new campsites, picnic areas, trails, expanded dock facilities, or additional structures to serve visitors or house island-based park employees. The type, number, and location(s) of such developments, if needed, and an assessment of their impacts would be addressed in a future plan/environmental document, such as a new general management plan.

5. There is one private life estate on the sand spit on the south end of the island.

- 14) **On pages 42-43, Environmentally Preferred Alternative**, I believe the NPS has skewed this analysis to try to make Alternative C appear to be the environmentally preferred alternative. It is obvious that Alternative B is the environmentally preferred alternative and will protect wilderness, biological diversity (including ecosystems) wildlife, migratory birds, water quality, quiet, solitude, soils, air quality, and other resources better than Alternative C. In addition, Alternative B ensures that there is less development because lands are restricted to wilderness. The AINL is a sensitive habitat that cannot take large numbers of visitors. By allowing more lands to develop, Alternative C ensures that the NPS will have an incentive to develop more. NPS states that Alternative B has a "higher potential for cultural resource impacts in the nonwilderness areas because of future developments" but then does not specifically state where this will occur and what cultural resources will be impacted. NPS also states that somehow Alternative B does not "preserve and tell the stories of the park onsite as well as Alternative C." Since NPS can provide brochures to tell the story there is no need to install interpretive exhibits and signs at such locations. In addition, docks and the areas surrounding these docks that can have interpretive signs to provide more information.
- 15) **On page 44, Alternative Considered But Dismissed**, NPS does not state why it must have "growth areas" on several islands for more recreational and other uses. Demand must not drive what the NPS does. What is required is a thorough study of what the carrying capacity of each island is for certain uses under certain scenarios. This is not provided here for the different alternatives so the public cannot assess whether too much development is planned in relation to wilderness designation. The fact that few people support Alternative 2 is not a reason to drop the alternative. The Council on Environmental Quality's regulations require that "all reasonable alternatives" be analyzed. The regulations do not say all reasonable alternatives that have the support of the public will be analyzed.
- 16) **On page 45, Table 3, Summary of Impacts**, the table does not define the terms minor, moderate, negligible, etc.
- 17) **On page 55, Wildlife**, if Long Island is important for migratory birds like piping plovers, passerines, waterfowl, and shorebirds then protection of this important habitat via wilderness designation for all or part of Long Island is appropriate.
- 18) **On page 56, Archeological Resources**, where are the 60 archeological sites that have been found on AINL in relation to wilderness proposals? Which islands are they on? The public needs this information to assess the appropriateness of the different alternatives for wilderness designation.

6. This is a summary of the environmental consequences. For details on the impacts, see pages 80-85. Again, it needs to be pointed out that due to the broad nature of the study and the alternatives, the impact analysis is general and qualitative.
7. Although the National Park Service can provide brochures, and interpretive signs can be installed in the areas by the docks, other on-site interpretive media, such as wayside exhibits or signed self-guided trails, are not permitted under NPS policy in wilderness. Exhibits and interpretive trails can provide information on-site that cannot be provided the same way in a brochure or in a distant sign. Because most of the islands would be in wilderness under alternative B, there would be fewer opportunities to use these media, compared to alternative C. Thus, we do not believe that alternative B would preserve and tell the island stories as well as alternative C.
8. The analysis of carrying capacity is beyond the scope of this wilderness study. The question of what developments are needed and visitor use levels are more properly addressed in a general management plan and/or wilderness management plan. See also response 1.
- With regard to the dismissal of the alternative, we agree that few people supporting an alternative is not a reason by itself to drop a reasonable alternative. This was only one of several reasons for dismissing the alternative. (The primary reasons it was dropped, as noted on p.44, is that it is very similar to alternative B and it had very complex, hard to define boundaries.)
9. The presence of migratory bird habitat is not one of the criteria for identifying an area to be suitable for wilderness. Protection of important migratory bird habitat also is not, by itself, a sufficient reason for designating an area as wilderness. Whether or not Long Island is designated as wilderness, the National Park Service would continue to protect this valuable area to satisfy the purposes for which the park was established, as a natural zone in the park's current *General Management Plan*, and in the case of the piping plover as required under the Endangered Species Act. See also response 8 to Friends of the Boundary Waters Wilderness.
10. The locations of the archeological sites are sensitive information and under the provisions of the Archeological Resources Protection Act are not open to public disclosure. However, as noted on p.56, nearly all of the islands have some record of human occupation. Whether or not the islands have archeological sites has no bearing on the different wilderness alternatives – the presence or absence of archeological sites was not a factor in developing the alternative wilderness proposals.

11. 19) **On page 57, Historic Structures**, where are the 163 structures that have been found on AINL in relation to wilderness proposals? Which islands are they on? The public needs this information to assess the appropriateness of the different alternatives for wilderness designation.
12. 20) **On page 60, Visitor Nonwilderness Experiences**, many of the recreational activities and experiences that are listed can also be conducted in wilderness. These are not necessarily nonwilderness experiences only. For instance camping, picnicking, kayaking, hiking, swimming, fishing, hunting, photographing, bird watching, and berry picking can all be done in wilderness.
13. 21) **On page 68, Introduction**, should demand for new picnic areas for large groups be met? NPS does not have to meet demand and carrying capacity figures must be developed for different areas and different recreational activities to ensure that overuse does not occur. Since NPS has a shortage of personnel, money, and equipment how can it build visitor contact stations, storage facilities, shelters, restrooms and amphitheaters on islands? NPS must be clear and honest with the public what it intends to do on islands or parts of islands that are designated as wilderness or nonwilderness. This DEIS does not give a clear indication of the type, extent and location of development that will occur.
14. 22) **On pages 70-72, Methodologies for Analyzing Impacts**, NPS fails to define many key words or phrases for the intensity of impacts on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. This prevents the public from fully understanding the impacts that NPS allots to each alternative. Some of the words or phrases that must be defined include: barely noticeable; extremely localized; slight but noticeable; clearly noticeable; appreciable effect; highly noticeable; substantial change; small number; appreciable park wide effect; highly noticeable and widespread; barely detectable; slightly detectable; clearly detectable; severely adverse; exceptionally beneficial; substantial, and highly noticeable influence.
15. 23) **On page 73, Cumulative Impacts**, I disagree that initiatives to outsource services provided by NPS will not result in a cumulative impact. It is obvious that NPS has some of the most dedicated employees in the entire federal government. Those who are contracted to do the job will not care or perform at the level of NPS personnel. In addition, reduced law enforcement staff, an inadequate law enforcement staff, or a law enforcement staff that is preoccupied with duties other than patrolling AINL will result in cumulative impacts due to less protection of resources.
16. 24) **On page 74, Cumulative Impacts**, how does NPS know that new concessions contract for tour boats "probably would not change existing use patterns of the park or substantially change use levels"?

11. Like the archeological sites, most of the islands have historic structures. Only Eagle and North Twin Islands are not known to have historic resources. Although the interpretation of historic resources was considered in developing the alternatives, the locations of the historic resources on the islands was not a major factor in distinguishing the wilderness alternatives and does not affect the appropriateness of the alternatives.
12. We agree that most of these experiences can also occur in wilderness areas. The intent of this paragraph was to give an overview of all the experiences offered on the islands.
13. We agree that we do not have to meet demands for new picnic areas and that there is a need to identify carrying capacities to ensure that overuse does not occur. However, this is beyond the scope of this study. We also are not proposing that new developments be built on the islands. Please see responses 1, 4 and 8 above.
14. The impact intensities in this wilderness study / environmental impact statement are necessarily general and conceptual given the broad nature of the study and its alternatives. The terms you refer to were meant to assist the reader in understanding the relative intensities of the impacts. Standard dictionary definitions are adequate for understanding what is meant by these terms. See also response 1.
15. Although there could be a cumulative impact due to initiatives to outsource services provided by NPS staff, this impact would occur regardless of whether or not wilderness is designated in the Apostle Islands – the impact would be independent of wilderness. We have revised the text to state that the initiatives would not have a cumulative impact with respect to wilderness designation.
16. This statement is based on past visitor use trends; tour boat capacities, routes, and schedules; and our professional judgment. We cannot state for certain that use patterns and levels would substantially change, however, which is why the word "probably" was used.

25) **On page 74, Cumulative Impacts**, I do not agree that “no ongoing or foreseeable actions” would result in cumulative effects. NPS must do a better job on cumulative impacts.

17. 26) **On page 75, Impairment of Park Resources or Value**, NPS does not recognize that other developments, that occur outside wilderness, could impair wilderness values and character due to spillover use, over use, and carrying capacity exceedences. I do not agree that impacts “cannot be analyzed in the nonwilderness areas due to uncertainty regarding what actions might be taken where and when, and what resource values might be affected.” This is a copout. NPS knows what types of facilities might go where, what the current trends show, and can give a reasoned estimate of impacts.
18. 27) **On page 76, Alternative A**, second paragraph, scour caused by wave action patterns due to dock structures could cause additional erosion and fishery impacts.
19. 28) **On pages 77-78, Alternatives B & C**, how many and where will the campsite facilities mentioned be constructed in wilderness areas? What impacts will these have?
20. 29) **On page 83, Alternative B, Conclusion**, NPS does not provide a map which shows where cultural resources are so the public cannot assess for itself any impact differences between the alternatives.
21. 30) **On pages 83-84, Alternatives C & D**, NPS does not mention and quantify what the greater opportunity for development will be and the greater environmental impacts will be in Alternative C versus Alternative B.
22. 31) **On page 86, Alternative A**, define “near future” with regard to new development.
23. 32) **On page 87, Alternative C**, second paragraph, define what “minor to moderate, long-term, adverse impacts” are.
24. 33) **On page 89, Impacts on Visitor Nonwilderness Experiences**, first paragraph, a number of the activities mentioned, like camping, picnicking, swimming, socializing, and sunbathing can be done in wilderness. They are not limited to nonwilderness.

17. The impairment determination is focused on impacts caused by the alternatives for wilderness designation that would adversely affect park natural and cultural resources to such a degree that there is an impairment of park resources and values. We are not proposing any new developments as part of this wilderness study – external developments and uses in non-wilderness areas are not part of the study alternatives and consequently are not considered as part of the impairment determination. With regards to impacts in nonwilderness areas and the possibility of impairment, we disagree with your assertion that the potential is there. See response 1.
18. While some of the park’s docks have caused impacts (especially to the transport of sediments just offshore), we are not aware of scour from wave action ever being identified as a problem in the park.
19. It is not possible to state in this document if any campsites would in fact be built in wilderness or how many and where the campsites would be constructed. (See response 1.) However, if campsites were built, the text very generally describes impacts to soil compaction, vegetation, and wildlife that would occur.
20. Please see responses 10 and 11.
21. As stated in response 1, we are not able to quantify opportunities for development in the alternatives. However, there is no "greater opportunity" for development in alternatives C and D, compared to alternative A, the no-action alternative. In fact, as the text notes, relative to alternative A these wilderness alternatives would have a lower potential for new development on most of the islands.
22. We have changed the text from "near future" to foreseeable future.
23. The adverse impacts, including fewer opportunities for solitude and primitive, unconfined recreation, and impact on apparent naturalness are noted in the 1st paragraph of the analysis on p.87.
24. We agree that these activities can take place in the wilderness as well. But in this section we are focusing on impacts on these activities in areas that are not designated as wilderness.

25. 34) **On page 89, Alternative A**, the number and impacts of more group campsites are not enumerated here.
26. 35) **On page 89, Alternative B**, on page 68 NPS says trails can be built in wilderness. Here NPS says that trails with interpretive signs cannot. If there is an alternative, like use of a brochure, then why is this considered to be a hindrance and analyzed as a negative impact?
- 36) **On page 90, Alternative B, Conclusion**, I consider it a positive benefit of Alternative B that the "potential for substantial expansion (which is not defined) of recreational or visitor use facilities would be limited under this alternative."
27. 37) **On page 90, Alternative C**, expansion of group campsites and picnic areas means more impacts which are not enumerated here. In addition by providing more of the "most visible edge" between wilderness and nonwilderness NPS potentially sets the stage for more illegal use because people will be conducting more nonwilderness activities right next to more wilderness areas. What are the impacts of this decision?
28. 38) **On page 93, Alternative A**, NPS states that emergencies would be responded to more fully since there would be equipment on the islands in Alternative A that could help with emergencies. Another impact is that if people know there is more emergency equipment on the islands they will not come as prepared and will expect NPS to get them out of situations quicker and more efficiently. This will increase NPS's liability. This impact should be discussed.
29. 39) **On pages 93-94, Alternative A**, NPS needs to say that with more development there will be more maintenance, that use of chainsaws and motorized vehicles are difficult to get out to the islands, and needs to state how much facility maintenance workloads could increase.


25. The impacts of more group campsites are identified in the 1st paragraph of the analysis. We cannot project the number of group campsites that might be provided under alternative A. (Indeed, it is not certain that any group campsites would be built.) The need for these facilities would be addressed in a future plan. See also response 1.
26. The text is not saying that trails with interpretive signs are a negative impact. Rather, because certain new recreational facilities (including these trails) would be confined to a relatively small area, crowding could increase, which could have an adverse impact on visitor nonwilderness experiences.
27. The impacts of group campsites and picnic areas are addressed in the 1st paragraph of the analysis on p.90. With regard to having the most visible "edge," we disagree that there would be more illegal use due to people conducting more nonwilderness activities next to wilderness. We do not foresee illegal activities, such as visitors riding off-road motor vehicles in wilderness. Activities that might be illegal in wilderness do not generally occur on the Apostle Islands now and there is no reason to expect they would occur in the future. And as the text notes, there would be more opportunities to educate visitors about wilderness and its role, which would further reduce the likelihood of illegal activities.
28. The text does not state that more emergency equipment will be provided. Rather, it states that there is the possibility that the park's ability to respond to emergencies could be enhanced, although the need for additional, fully equipped, island-based locations is currently fairly low. There is no reason to believe visitors would expect the National Park Service to respond to visitor emergencies any differently. There is also no reason to expect an increase in liability due to visitor expectations.
29. The text states on the top of p.94 that workloads could increase and could result in a moderate to major adverse impact on park facility management operations. It is not possible to quantify this, given the large number of uncertainties regarding future facilities (numbers and locations, if any), staff levels, and funding. See also response 1.

30.

40) **On pages 94-95, Alternative B**, NPS states that less development means that there would be less need for interpretive services. I believe this may not be true. NPS personnel can still visit islands and interpret, they can develop brochures and other items to assist someone in wilderness, can continue to place signs in appropriate places, and they can continue to provide visual media at stations. Since there are readily available alternatives (brochures) as alternatives to signs there should be no significant impact. It is of concern that NPS does not appear to believe that 2,500 acres is enough to develop (6% of the AINL) in Alternative B. This leads one to the concern about how large an area NPS actually wants to develop and what development it actually wants to construct. These impacts are not revealed in this DEIS.
31.

41) **On page 96, Alternative C**, second paragraph, it seems obvious that Alternative C requires an increased effort in protection of natural and cultural resources since there will be higher visitor presence, use, and facility development.

I appreciate this opportunity to comment. Thank you.

Sincerely, 
Brandt Mannchen, 5431 Carew
Houston, Texas 77096
H713-664-5962, W713-640-4313

30.

We agree that less development does not necessarily mean there is less of a need for interpretive services. We also agree that NPS staff could still visit islands and interpret, develop brochures, place signs, and provide visual media in alternative B. But relative to alternative A, where there *could* be more potential interpretive developments, the need for interpretive personal and nonpersonal services would be less. It is not certain that services would be reduced under alternative B, but if they were the text states that there *could* be a minor adverse impact on the park's interpretive operations. It is not known how large an area would need new interpretive developments, if any, and this study is not intended to answer this question. See response 1.
31.

We disagree that there would be an increased workload for cultural and natural resource staff under alternative C. Higher visitation levels could occur under all of the alternatives, not just alternative C, which could increase workloads. But compared to alternative A, there would likely be fewer developments, which would reduce the need for compliance-related activities.

October 17, 2003

Mr. Jim Nepstad
Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

Dear Mr. Nepstad,

Thank you for the opportunity to comment on the "Draft Wilderness Study" pertaining to proposed wilderness designation for the Apostle Islands National Lakeshore. (I first submitted a letter on proposed wilderness designation to the Park on 15 January 2002.) I am very familiar with the Lakeshore and have worked on bird studies with different park ecologists since 1974. I was also involved with Rep. Obey's office in 1986 to add Long Island to the ATNL as the last remaining feather, if you will, in the Park Service's hat. It is the future of Long Island that concerns me now, and I am perplexed to see that it has been excluded from the list of islands proposed for wilderness designation.

Since 1975, Long Island has been connected to Chequamegon Point to form a unique barrier spit, arguably the most important and pristine of any on Lake Superior, and perhaps the Great Lakes. Long Island may become, as it has historically, a barrier island due to high water and storm surge, but there is no likelihood of that happening any time soon. Ecologically, the island stands apart from its sister islands because of its barrier status, diverse plant communities that occur across 12 parallel sand ridges, and from an avian ecologist's perspective the most important staging area for migrating shorebirds on western Lake Superior. On beaches, sandbars, ephemeral dune pools, and along edges and openings of the "Sand Cut" area, I have observed over the years the following shorebirds: Black-bellied Plover, Lesser Golden Plover, Semipalmated Plover, Piping Plover, Killdeer, Greater Yellowlegs, Lesser Yellowlegs, Willet, Spotted Sandpiper, Upland Sandpiper, Whimbrel, Hudsonian Godwit, Marbled Godwit, Ruddy Turnstone, Red Knot, Sanderling, Semipalmated Sandpiper, Least Sandpiper, White-rumped Sandpiper, Baird's Sandpiper, Pectoral Sandpiper, Buff-breasted Sandpiper, Dunlin, Short-billed Dowitcher, Long-billed Dowitcher, Common Snipe, and Wilson's Phalarope.

Long Island is the only location in Wisconsin and on western Lake Superior where the state and federally endangered Piping Plover nests. I have surveyed all potential breeding Piping Plover habitat in the state and nothing comes close to the quality of the undisturbed beach and dune complex that characterizes the southern end of Long Island, which serves to attract nesting Piping Plovers.

For the above reasons, Long Island certainly deserves to be included among the islands proposed for wilderness designation. To argue that current policy sufficiently protects the island is no different than those who question why the Park is pursuing wilderness designation when it would result in so little change. The answer, as your articulate Superintendent has stated, lies in the question. In this case, wilderness status affords a

Continues next page

Response to Sumner Matteson

1. See response 3 to PEER, response 8 to the Friends of the Boundary Waters Wilderness, response 9 to Brandt Mannchen, and response 1 to Emmet Judziewicz.

layer of protection that ensures our children and grandchildren will enjoy the same Apostle Islands experience we do, and that Piping Plovers, too, will have the opportunity to breed on western Lake Superior for generations to come.

Finally, I understand that the issue of Native American treaty rights is the basic reason why Long Island has been excluded from the list of islands proposed for wilderness designation. One of the elders from the Bad River tribe, Joe Rose, told me recently that he would support wilderness designation for Long Island if treaty rights were retained. I would think that treaty rights would have to be respected regardless of the U.S. government's wilderness designation. Perhaps I am misinformed on this latter point, but in any event the draft wilderness study points out that the Park has managed the islands "to preserve their wilderness values," with the Park's 1989 *General Management Plan* stating that about 97% of its lands were suitable for wilderness designation. This ostensibly includes Long Island. Without wilderness designation, the door would remain open for development to occur at some point in the future and that would be incompatible with the island's present wilderness state.

I hope you will modify the preferred alternative (Alternative C) to include Long Island. Please consider giving it the protection its unique status deserves.

Sincerely,

Sumner W. Matteson
Avian Ecologist
5101 Coney Weston Place
Madison, WI 53711-1105

To Whom It May Concern,

1.

As a resident in the area of the Apostle Islands and a person that fishes around them, I am greatly opposed to designating them as a wilderness. I have been to wildernesses. The Boundary Waters Canoe Area in Minnesota and Cloud Peak in Wyoming. Those places are located where they can be wildernesses. The Apostle Islands ARE NOT. Sure, you can call it wilderness but it isn't. Furthermore, with the restrictions that come with wilderness designation, I
2.

fear the trouble I will get into when I have I am on the lake in my boat or when ice fishing should I have to go ashore for whatever reason. I'll have things with me that aren't allowed in wilderness and my boat or snowmobile or atv will be motorized.
3.

The islands are pretty nice as they now are. Your superintendant says they are being "managed like wilderness" so there is no need for the designation. WILDERNESS DESIGNATION TAKES AWAY FROM OLDER PERSONS.

Please do not designate the islands as wilderness.

Sincerely,

M. James Nemec
65605 Nemec Road
Mason, WI 54856

Responses to M. James Nemec

1.

Wilderness can be, and has been, designated in areas that are much smaller and with much different conditions than the areas you cited. See also response 1 to the Izaak Walton League, response 3 to Citizens Against Apostle Islands Wilderness, and response 2 to Celeste Peltier.
2.

We do not foresee the need for additional restrictions on visitor use based on wilderness designation, although changes in future visitation patterns, visitor numbers, activities, resource conditions, etc., could require new restrictions in the future regardless of whether or not wilderness is designated in the park. You cannot legally drive your snowmobile or an ATV now on the Apostle Islands, regardless of wilderness. You should have no problems, however, when you are using your boat and have to go ashore.
3.

We disagree that wilderness designation would take away access from older persons. All people, including the elderly, will continue to have access to the islands via motorboats, sailboats, etc., and can walk on the islands like they currently do.

To: Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

From: Celeste Peltier
835 Ole Hanson RD
Eureka, CA 95503

Date: 10/13/2003

Re: Apostle Island Wilderness Designation Plan

To Whom It May Concern:

The purpose of this letter is to present a critique of the Draft Environmental Impact Statement (DEIS) regarding the wilderness designation of the Apostle Islands National Lakeshore. This draft EIS examines alternatives for the wilderness designation of the Apostle Islands. The Apostle Islands were given to the State of Wisconsin to be administered by the National Park Service. Law designates that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. I will review several points including; procedural criteria, Purpose and Need Statement, alternative presentation, technical/data presentation, and mitigations. Recommendations will be made throughout this letter and then summarized at the end.

The document was presented in an understandable and straightforward manner. The public was presented with information regarding the alternatives reviewed and rejected and the impacts of each alternative. The document only discussed one rejected alternative, which was rejected because the alternative caused the wilderness areas to be highly fragmented and there was little support for the alternative at public meetings. I do agree with the reasons for rejecting the alternative because the concepts of the rejected alternative are included in the preferred alternative. I feel that sufficient information was presented in the document to make an informed decision regarding if the area should be designated as wilderness. As a wilderness designation this is not a technical document and thus there is little technical information in the document. The document focuses on the designation of wilderness areas, not the management of the park if designated wilderness. Clearly, after review, there was public involvement in the development of the document.

The DEIS does appear to follow suggested NEPA formats. The Table of Contents follows the proper format and presentation of material in the document. There are four alternatives presented in the document:

- Alternative A No Wilderness - No Action Alternative
- Alternative B - Maximize Wilderness (94% proposed wilderness)

- Alternative C - Preferred Alternative and Environmentally Preferred alternative (80% proposed wilderness)
- Alternative D - Limit Wilderness to Remote Areas (55% proposed wilderness)

NEPA calls for the No Action alternative, which is present in this document. The list of preparers is identified. All of the preparers serve with the National Park Service, perhaps preparers should be chosen from various agencies, as this will not give bias to the study. For instance, a developer from the planning department should be brought into the study so an opinion on development of the islands can be addressed (i.e. what are the benefits of designating the islands as wilderness, versus development). The general reading is easy to follow and the document conforms to a logical manner. A glossary is provided in the appendices, giving the public a way to look up unfamiliar vocabulary in the document. Another useful section to include may be a list of acronyms. Many acronyms are unfamiliar and including this list will give the public a convenient place to look them up.

Both tables and figures are utilized in the document in key places. There is a good use of highlighted figures that clearly display definitions and pertinent points of the document. The tables are helpful in summarizing each alternative and components of the alternative (i.e. costs, environmental aspects). Tables presented in the main body of the document were not complex and were easy to understand. Listing the benefits and impacts of each alternative in one spot enables the reader to learn about the alternatives without having to read multiple pages. The maps used in the document were interesting and easy to understand. Separate maps were created, illustrating the alternatives examined for wilderness designation. Thus far, information is rather scant in the appendices. The headings of the appendices suggest that more information will be incorporated into the document at a later date. Further information regarding plant and animal species present in the wilderness area will be helpful.

The purpose and need statement is well written and clearly defines the necessity of the project. The fact that the document evaluates only which areas should be made into wilderness areas and not how these areas will be administered is made clear in the Purpose of the document. The Need Statement is clear as well. All lands within the National Park Service must be evaluated for inclusion within the national wilderness preservation system. Sections of the Apostle Islands have been logged and mined, quarries are present and fishing occurs in surrounding areas.

1. These activities should discount the Apostle Islands as a wilderness area. However, according to the Eastern Wilderness Act, these smaller areas can still be considered as wilderness. This is an important point to clarify. Will logging or quarrying to any extent take place on areas determined not to be wilderness, or will all of these activities be stopped if any parts of the Islands are determined to be wilderness? The document is not clear on whether or not these activities still take place on the Islands.

Responses to Celeste Peltier

1. Although logging and quarrying took place in the past, they have not occurred on the Apostle Islands for many years. Resuming these commercial activities would not be consistent with the purposes of the park or the park's current General Management Plan, and would not be permitted to resume on any of the islands regardless of whether or not wilderness is designated in the park.

2. Conflicts in defining wilderness areas are present in the Purpose and Need section of the document. A wilderness is defined as:

“...an area of undeveloped Federal land...without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected *primarily* by the forces of nature, with the imprint of man's work *substantially* unnoticeable; (2) has outstanding opportunities for solitude *or* a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land *or* is of sufficient size as to make practicable its preservation and use in an unimpaired condition....”

Underneath this statement is another statement stating that wilderness does not have to be pristine, nor greater than 5,000 acres, and those areas previously altered can qualify as wilderness. The document should state which definition will be followed. This will create a stronger document. If the first definition of a wilderness is followed, then the Apostle Islands are not a wilderness and thus cannot be designated as a wilderness area.
3. Four alternatives are evaluated in the document and the rejected alternative is mentioned, along with reasons for rejection. Alternatives were developed through public involvement and sufficient information is given for each alternative. The alternatives are listed and the preferred alternative is listed as such. If other “rejected” alternatives were discussed during scoping and they are not present in the document, then these alternatives should be included in the alternative section of this document. Including these alternatives will enable the reader to better understand how the present alternatives were reached and why they are “better” alternatives to consider. I do agree with the preferred alternative selected in this study. The alternative attempts to balance human recreational use of the park and preserve pristine areas of the park. The alternative section of the document is clear in defining the criteria used to rank the alternatives. Section 101 of the National Environmental Policy Act was used to determine the preferred alternative, but little support is given as to why the alternative was chosen as the preferred alternative. More support should be given in this section.

The effects of the alternatives were covered in great detail, historic, cultural, Native American, and environmental resources are discussed. The document covers the concerns many citizens had about loss of various uses of the island. Concerns were raised about hiking and boating in the area, should the Islands be designated as a wilderness area. As the preferred alternative splits the Islands into wilderness and non-wilderness park areas, how does motorized use of non-wilderness areas affect wilderness areas? For instance, oil slicks from boats may wash onto wilderness area beaches and noise from these areas may disturb wildlife in other areas. Visitors will also bring non-native species (i.e. seeds, insects) to the island. These non-native species may have negative impacts on the wilderness areas.
4. document is clear in defining the criteria used to rank the alternatives. Section 101 of the National Environmental Policy Act was used to determine the preferred alternative, but little support is given as to why the alternative was chosen as the preferred alternative. More support should be given in this section.
5. The effects of the alternatives were covered in great detail, historic, cultural, Native American, and environmental resources are discussed. The document covers the concerns many citizens had about loss of various uses of the island. Concerns were raised about hiking and boating in the area, should the Islands be designated as a wilderness area. As the preferred alternative splits the Islands into wilderness and non-wilderness park areas, how does motorized use of non-wilderness areas affect wilderness areas? For instance, oil slicks from boats may wash onto wilderness area beaches and noise from these areas may disturb wildlife in other areas. Visitors will also bring non-native species (i.e. seeds, insects) to the island. These non-native species may have negative impacts on the wilderness areas.

2. There are not two definitions of wilderness. Referring to the italicized words in the definition, the Wilderness Act provides latitude in designating areas that are not pristine and in designating areas that are smaller than 5,000 acres (so long as the area is practicable to preserve and use). See also response 1 to the Izaak Walton League and response 3 to Citizens Against Apostle Islands Wilderness.
3. There were no alternatives considered but dismissed by the study team other than the one identified on p.44. During the scoping process people proposed that some islands be designated as wilderness and others be excluded as wilderness. These comments were incorporated into the alternatives that were developed by the study team.
4. Comment noted. We believe the discussion on pages 42-43 regarding why alternative C was selected as the environmentally preferred alternative under §101 of the National Environmental Policy Act is sufficient. Please also refer to p.12, which notes that a "Choosing By Advantages" process was used to select the preferred alternative. Alternative C was determined to best meet the four factors listed and had the highest advantage of all the alternatives considered.
5. The use of motorized boats in nonwilderness areas does not affect and has no bearing on the designation of wilderness, which was the purpose of this study. Oil slicks and noise from boats and the spread of non-native plants by visitors would affect the islands whether or not wilderness was designated – these impacts would not be the result of wilderness designation and thus need not be assessed here.

The methodologies used for analyzing impacts are discussed. Tables or figures should be added to this section to ~~make~~ clarify the main points of the section. The section gives a rating of negligible, minor, moderate, or major to each of the alternatives, regarding various impacts.

6. There is not a lot of supporting evidence in this section regarding how the alternative ratings were assigned. More supporting evidence should be given. This section is broad and general, with no supporting specifics. More examples should be given in this section. The use of signs and trails is discussed in this section, proper installation of signs and trails (using BMP's) will reduce effects on natural resources. These points are not discussed in this section and should be.

Mitigations are not discussed in detail in this document, clearly because wilderness designation does not lead to mitigation measures. Mitigation measures would be applied for developments that may be built in the non-wilderness areas. Sites would be surveyed for impacts before developments would be permitted.

In conclusion, the EIS was prepared in an understandable format. There was good use of tables to present and summarize information throughout the document. Helpful maps identifying the project site were used in the body of the document. The information presented to the public was broad and proof of public involvement was provided. The document was thorough in consideration of studies. For instance how the non-wilderness areas will affect the wilderness areas. The document expresses that a balance between human recreation and wilderness designation was considered in alternative development and choice of the preferred alternative. This is important, as the public will be more inclined to agree with the wilderness designation of the Apostle Islands.

Thank you for providing me with the opportunity to comment on the DEIS. I hope my recommendations will be taken into consideration.

Good luck with the completion of the project!

Sincerely,

Celeste M Peltier

6. As noted on p.70, the impact analysis was based primarily on information provided by experts in the National Park Service, and on park staff insights and professional judgments. Also as noted on pages 68-69, the analysis is general and qualitative because it is highly uncertain what development(s) might be built where, and to speculate about other management implications of wilderness and nonwilderness is not appropriate. Examples of potential developments in nonwilderness areas were identified on p.68 and generally assessed in the chapter. Given the uncertainty of what might be built, mitigation measures were not identified in this study, which is primarily focused on the impacts of wilderness designation and not on the installation of signs and trails. As stated on p.73, it was assumed in this analysis that appropriate mitigation measures would be applied for developments that may be applied in the nonwilderness areas. Specific mitigation measures, such as best management practices for the installation of signs and trails, are more appropriately addressed in a project design document and the accompanying environmental document.

Sheree L. Peterson
8 S. 7th St., Box 8
Bayfield, WI 54814

October 10, 2003

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

Dear Wilderness Study Coordinator:

I submit the following comments regarding the Apostle Islands National Lakeshore Draft Wilderness Study/Environmental Impact Statement.

I have worked in the tourism industry in the Lake Superior region for 27 years, and have lived in Bayfield, Wisconsin for 25 years. I worked as a seasonal employee for the Apostle Islands National Lakeshore for 4 years, and was employed at Isle Royale National Park for 2 seasons. I have worked directly, in a variety of capacities, with visitors to the Apostle Islands region. I have spent over 20 years studying Bayfield and Apostle Islands region history, and have spent hundreds of volunteer hours working to preserve area history by serving on the boards of the Bayfield Heritage Association, Inc. and the Bayfield County Historical Society. I have also worked at the Madeline Island Historical Museum.

I am very concerned about the status and preservation of cultural resources as impacted by wilderness designation in the Apostle Islands National Lakeshore. Early in the establishment of the Apostle Islands National Lakeshore, NPS representatives met with local historical organizations to do general planning, so that each group could focus on preserving and interpreting particular themes and areas of history and not overlap efforts. I hope that establishment of wilderness areas in the Apostle Islands National Lakeshore does not lead the National Park Service to fail in its commitment to preserve island history. The residents of the area have graciously shared their knowledge, archival materials and artifacts relating to Apostle Islands history, trusting that the federal government will preserve this important story.

1. It is important to be objective as to whether any areas in the Apostle Islands National Lakeshore qualify under the definition of wilderness under the Wilderness Act. Because of the extensive human use and activities that have occurred on the islands since prehistoric times, any qualification needs to be based upon the Eastern Wilderness Act. However, I contend that because the significance and story of the Apostle Islands is so completely based on both natural and human history, that only a small percentage of the Lakeshore should receive wilderness status. This portion should consist of the more remote islands (such as North Twin Island), where less human activity has taken place and left its mark. I believe the intermixing of wilderness and non-wilderness areas within and among the land masses in the Lakeshore, surrounded by waters that are non-wilderness should be avoided and does not contribute to the essence of wilderness.

Responses to Sheree Peterson

1. Your proposal was addressed in alternative D, which limited wilderness to remote areas in the park. We do not believe the NPS preferred alternative would result in an intermixing of wilderness and nonwilderness areas, surrounded by waters that are nonwilderness, nor detract from "the essence of wilderness." In fact, most of the islands would be managed as wilderness, as they have been, under the NPS preferred alternative so there would be little intermixture of wilderness and nonwilderness when one is on the islands. Although it is true that the islands would be surrounded by nonwilderness waters, most visitors' wilderness experiences in the interiors of the islands would not be degraded by activities on the waters. It is also worth pointing out that other designated wilderness areas are surrounded by nonwilderness waters, such as at Isle Royale National Park, Cumberland Island National Seashore, Gulf Islands National Seashore, and Fire Island National Seashore.

Two of the most troubling aspects of wilderness designation, to me, are the prohibition of interpretive signs and restrictions of future trail establishment in wilderness areas. I see these things as limiting visitor accessibility and understanding of the significance of the Apostle Islands National Lakeshore. Apostle Islands visitors for the most part, are thoughtful and responsible, and very open to educational opportunities. Interpretive signage is an important method of telling the natural and human history of the Apostle Islands. I believe that the door should remain open to the possible establishment of a few more trails on the islands. Wilderness status closes that door.

It has been said that the NPS preferred wilderness alternative would allow the Apostle Islands National Lakeshore to continue to be managed as it has been so far. Many positive things have been accomplished by NPS, such as archaeological studies, biological studies and inventories, historical and engineering studies and stabilization of lighthouses, protection of fragile vegetation and rare species, development of docks, trails and campsites. However, there has always been more that should be done to survey and document the resources so that management plans can be made to best preserve the significant features of the Lakeshore and provide the public the opportunity to experience and understand the significance of the Apostle Islands archipelago. Sadly, we have lost some historical sites on the islands due to inaction. The Herring King Cottage on Sand Island, its roof built from the inverted hull of a damaged boat, has decayed beyond preservation. And the historic buildings of Trollers' Home resort on South Twin Island were inappropriately torn down two decades ago by the National Park Service.

2.

After inquiring, I have been told by both a representative of the Wisconsin Historical Society and the National Park Service, that the Wisconsin Historical Society was asked to comment on the wilderness establishment, taking into consideration its impact on only Apostle Island historical sites listed on the National Register of Places. It is very inappropriate not to consider all cultural resource sites on the islands, as they should be part of an objective study of any wilderness proposal. In addition, some sites have potential for National Register listing. Their inclusion in wilderness areas would undoubtedly deter forever the funding for their research, nomination and preservation. Since a historical resource survey of the Apostle Islands National Lakeshore has not yet been completed (and contracting out for this survey was begun just this past summer), I cannot imagine how an informed, objective decision regarding wilderness status can be made without this vital piece of the puzzle.

From talking with area residents and reading several letters to editors of local newspapers, it seems that the public is misinformed about the wilderness study, and that some groups and individuals have responded to overly simplified versions of the issues that need to be considered. I have heard some voice their understanding that "wilderness status is the only way to prevent over-development on the islands." Since the Apostle Islands National Lakeshore was created and set aside as a national park area to prevent this from ever happening, and park management plans have never come remotely close to calling for resorts to be established on the islands, this is a mute point. The natural environment and the peace and solitude of the Apostle Islands are quite well-protected without wilderness status. Some who have supported the NPS preferred alternative are under the mistaken understanding that all cultural resources are excluded from the proposed wilderness areas, which is

2. Under both policy and statute, the National Park Service protects and preserves sites either listed in or eligible to be listed in the National Register of Historic Places, whether or not the site is in wilderness. Wilderness designation does not affect our ability to conduct research to determine if a site is eligible for listing. Likewise, if a site in wilderness has potential for national register listing it does not affect funding for research on its eligibility, on the nomination process, or on its preservation. It should be stressed that no decisions affecting the future of cultural resources on the islands, whether the resources are in wilderness or elsewhere in the park, will be made until a determination has been made on their eligibility for listing on the national register. If the resources are eligible, no decision will be made until consultations with the state historical preservation office and with affiliated tribes, if appropriate, have been completed.

Regarding the lack of information you noted, it is true that a historical resource survey has not been completed for the park. However, our decision on the selection of a wilderness proposal was based on best available information on hand, and we did not feel the lack of specific historical resource data was a critical factor in making a decision.

definitely not the case. And finally, it is unfortunate that many wilderness supporters from outside the area have been caught up in a “wilderness for wilderness sake” frenzy, with no knowledge of the cultural resource trade-offs involved in wilderness establishment in the Apostle Islands. The natural and cultural resources of the Apostle Islands National Lakeshore are important treasures that belong to all Americans. We should not sacrifice one for the other.

Most unfortunately for the Apostle Islands National Lakeshore, National Park Service employees come and go with the wind. Most employees spend only a few years at this park, just beginning to understand it before they move on to another park. It is difficult to absorb knowledge and understanding of the islands here in a short time, due to the challenges of seasonal travel on Lake Superior and the vastness of the resource. The preservation of resources is very much tied to people who are familiar with and understand the resource. By designating much of the Lakeshore as wilderness per the NPS preferred alternative, future budgeting for cultural resource research and projects could easily diminish as employees come and go in the park. For many people in the Lake Superior region, the memory of the poor manner in which historic structures were destroyed by the National Park Service on Isle Royale because of wilderness designation, is quite vivid.

I hope that those who have commented on the Apostle Islands wilderness study have: 1) actually read the study, 2) realize that the Apostle Islands archipelago is rich in both cultural resources and natural features, and that these areas overlap and are not readily divisible, 3) have objectively weighed the costs to cultural resources, and the restrictions to interpretation and education about both natural and cultural resources that would be caused by the NPS preferred wilderness alternative.

I suggest that less land area than that suggested in the National Park Service’s preferred alternative should be granted wilderness status. Specifically, I think that Oak and Stockton islands should be non-wilderness areas.

Because of Oak Island’s location adjacent to the mainland in the inner tier of islands, it is one of the more accessible islands for the general public and offers a wonderful opportunity for visitors to learn about its natural and cultural history. Because it is subject to more nearby marine activity than more distant islands, the qualities that define wilderness are not sufficiently present on the island in order to qualify it for wilderness status. And most importantly, Oak offers a rich cultural history that should be part of the visitor’s experience. Historical highlights include archaeological sites, a Native American sugar bush, a circa 1850 steamboat wood yard and dock (probably the first such wood yard in the region), the mid-19th century homestead of the Benjamin Armstrong family (significant figures in area and especially Anishinabeg history), and home of hermit Martin Kane whose adventures and exploits are typical of the unique, significant human history of the Apostle Islands region. In combination with interesting topography, flora and fauna, a sandspit, and wonderful hiking opportunities, Oak Island should be managed for the public’s best interest as non-wilderness. A well-planned system of interpretive signage is very appropriate on this island.

I also suggest that Stockton Island should remain entirely non-wilderness, for much the same reasons as Oak Island. Although it is further from the mainland, it is very accessible. The NPS preferred designation of partial wilderness designation on Stockton Island contributes to a fragmented management plan.

I think it is unfortunate that the comment period for the wilderness study coincided with the region’s busy tourism season. Many tourism-related business owners and employees whose industry may be affected by future decisions about the Apostle Islands National Lakeshore made from this study and who may have important input, have been working long hours during a busy season. Reading an extensive document and attending public meetings during the peak tourism season has not been possible for many of these people.

Thank you for the opportunity to comment on the wilderness study.

Sincerely,

Sheree L. Peterson
Sheree L. Peterson

3. Although we agree that the preservation of resources is tied to people who are familiar with and understand the resource, we disagree that wilderness designation will affect future budgeting for cultural resource research. The two topics are not connected – the movement of park employees and changes in cultural resource funding will occur independently of whether or not wilderness is designated in the park.

4. Oak Island was included in nonwilderness in alternative D. We agree that Oak Island has wonderful interpretive opportunities, but the island also clearly meets the criteria for wilderness designation. Nearby motorboat activity (or any activity for that matter) outside the proposed wilderness cannot be considered as a factor in determining whether or not to include any of the islands in our wilderness proposal. We do not believe that interpretive signs are needed on Oak Island in order to help visitors better understand the human and natural history of the park. Other interpretive techniques can be used on this island, such as brochures. We believe that signs and other interpretive facilities, if needed, can be limited to 20% of the park excluded from wilderness in alternative C – interpretive facilities on Sand and Basswood Islands and portions of Rocky and Stockton Islands would be sufficient to interpret most of the Apostle Islands’ primary cultural and natural resources and satisfy most visitors’ interpretive needs.

We agree that part of Stockton Island should remain as nonwilderness due to concentrations of visitors, employees, and facilities. But most of the island gets very little use and clearly meets the criteria for wilderness designation. Most interpretation can occur in the existing developed areas. There is no need for additional interpretive facilities outside these areas. We disagree that the wilderness proposal would result in fragmented management. The boundary separating the wilderness area and the nonwilderness area (Quarry Bay and the Presque Isle area) would be clearly identifiable on the ground to both visitors and managers and is not expected to lead to a major change in the management of resources or visitors from what currently occurs on Stockton Island.

Apostle Islands National Lakeshore
Attn: Wilderness Study
Route 1 – Box 4
Bayfield, WI 54814

Wilderness Study Coordinator

I have received and appreciatively reviewed the Draft WS/EIS. I would like to register my support for the preferred alternative, ALT. C, with a few minor caveats.

First, let me note that I have been involved with wilderness area reviews for over 20 years, primarily through conservation organizations such as the Wilderness Society and Oregon Natural Resources Council. I submitted extensive comments under the RARE II process and am familiar with both the restrictions of the Wilderness Act and with the mandates for National Parks. I support Wilderness designations where it is appropriate, but not across the board. Also, although now an Oregonian, I was born and raised in Wisconsin, and I have had the benefit of an extensive discussion with Superintendent Krumenaker regarding Park biology, history, and management philosophy.

National Parks are under a special mandate to preserve natural resources, provide recreational opportunities, and to protect wildlife. The Wilderness Act focuses primarily on protection of areas unimpacted by significant human activities and with opportunities for solitude. There is both overlap and conflict with these goals and I think Alternative C strikes the correct balance by providing wilderness protection for the largest and most contiguous areas while maintaining the flexibility for the administration of the Apostle Islands to manage for its human use potential.

A couple specific points:

- 179
1.

2.

3.

4.
- 1) It makes general sense to avoid fragmentation and choppy boundaries of wilderness areas, hence the removal of the peninsula on Stockton Is. and the consolidation of use areas on Rocky Is. make sense;

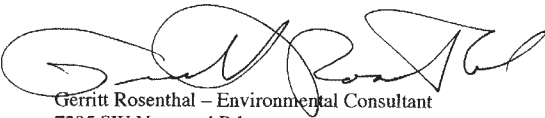
2) Alternative C (text) indicates that Eagle Island is included in the wilderness proposal, yet the map for Alt. C shows it excluded – this should be corrected [and it should be included as wilderness];

3) I would wonder if there is not some contiguous portion of Sand Is. that could be retained as wilderness particularly to protect specific habitat items, but am not familiar with the specific historical settlement patterns [a similar comment could be made for Basswood Is.];

4) Deer Island is removed from Wilderness designation on Alt. C, however, there is no discussion of the reasons for this change and why it makes sense. When removing a single large entity from the recommendation, a more complete explanation should be offered; and

5) It is unfortunate that some portion of the underwater environment could not also be designated as either wilderness area or research natural area – this may be due to lack of legal authority and should be explained; at a minimum, the EIS should identify areas that should be managed to protect pristine underwater conditions.

I appreciate the opportunity to comment on the plan.



Gerritt Rosenthal – Environmental Consultant
7205 SW Norwood Rd.
Tualatin, OR 97062

Responses to Gerritt Rosenthal

1. This mistake was corrected in the final document. Eagle Island is now shown as being included in the alternative C wilderness proposal.
2. We believe that Sand Island's important habitat areas can be protected through management zoning and other administrative actions, and that wilderness designation is not required to protect these areas. See also response 2 to PEER.
3. There is no Deer Island in Apostle Islands National Lakeshore. (If you are referring to Long Island, see response 3 to PEER.)
4. The reasons why the waters of Lake Superior and submerged lands within the park boundary were not considered for wilderness were described on p.26. The questions of managing these underwater areas to protect "pristine underwater conditions," and whether or not to designate a research natural area are beyond the scope of this study. It should be noted, however, that the current General Management Plan calls for efforts to maintain the "highest water-quality standards" in the park.

August 5, 2003

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield WI 54814

Dear Wilderness Study Coordinator:

Please accept this letter with my comments on the National Park Service's Wilderness Study and accompanying Draft Environmental Impact Statement (DEIS) for Apostle Islands National Lakeshore.

By way of brief background, until about two years ago, I was a northern Wisconsin (Ashland) resident for about a decade. I had several jobs during this time, including Bayfield County Zoning Administrator and Watershed Project Director for the Wisconsin Chapter of The Nature Conservancy. I became familiar with the Apostle Islands, and I developed a deep love and appreciation for them. Although I am no longer a Wisconsin resident, I maintain many friends and other ties to Wisconsin, and I still own 120 acres near Glidden in Ashland County.

After reviewing the relevant information on the APIS web site, I wish to support and urge the National Park Service to adopt Alternative B. As you know, this alternative reflects the past interim NPS management of 94 percent of the lakeshore's land base as de facto wilderness. This is the status quo of management that the vast majority of previous public comments supported. As described in the DEIS, implementation of this alternative will not impact existing lakeshore facilities or public uses. The previous concerns about motorized boat access to the islands have been resolved and Alternative B would not hinder this access.

I am frankly disappointed that the NPS preferred and environmentally preferred alternative is not Alternative B, and that it would not maintain this status quo. It would instead allow some additional areas to be available for new facilities and uses. I believe that all of these possible future facility upgrades and/or new or expanded public uses can and should be accommodated on the six percent of the lakeshore's land base that would remain non-wilderness until Alternative B. There is no compelling rationale given for why more non-wilderness lands must be "reserved" beyond those currently available. As noted in the DEIS, the Wisconsin Legislature intended that the conveyed lands be managed to protect wilderness characteristics. And there is sufficient room at and around existing facilities to provide for any future upgrades or expansions.

In addition, the overall trend for the National Park Service is to try to locate any new visitor facilities in "gateway" communities adjacent to or near park boundaries wherever possible. This protects park lands and resources while helping local communities. It provides the most efficiency in terms of reduced energy, transportation, and service costs,

Responses to Richard Spotts

1. Please see responses 2 and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, responses 1 and 4 to Brandt Mannchen, and response 1 to Harold Jordahl. With regard to your point that there is sufficient room at and around existing facilities to provide for future upgrades or expansions, we cannot speculate in this study whether there is or is not sufficient room for new developments. If a decision were made to build a new development(s) on the islands, we would likely try to locate that new development(s) in an area with existing facilities. But in some cases, such as interpretive facilities, a facility may need to be built in other areas. By not including several areas in wilderness, we would retain the flexibility to locate a new facility in the best suitable location both from a resource protection and visitor use perspective.

and most directly benefits the local citizens and economies of these communities. In this case, any new facilities can and should be located on acquired or leased private land in Bayfield, Red Cliff, and/or Port Wing. These locations would be the most convenient and efficient, least environmentally damaging, and attract the most visitors. In contrast, locating new facilities out on any of the islands, or along the pristine NPS-administered north shore, would cause much more significant adverse environmental impacts and energy inefficiencies, with comparatively smaller public benefits.

2. I was also disappointed to learn that Long Island was not included for wilderness protection in the NPS preferred alternative. The federally listed Least Terns have nested there in the past, but the trend toward more intensive recreation (including the presence of some dogs running on the beach) has scared them off. There are abundant dune and beach areas available for more intensive public recreation elsewhere. Long Island should be managed and protected as wilderness to restore its primitive character and perhaps entice nesting Least Terns to return.

While most wilderness issues are very contentious, especially where I now live in Utah, Wisconsin residents and the National Park Service are truly fortunate that there is such an overwhelming and strong public consensus in favor of maintaining the wild and natural "status quo" at the Apostle Islands. Please do not short-change this consensus and fumble this tremendous, positive opportunity for wilderness protection. Please adopt and work to implement Alternative B.

Thank you very much for your consideration.

Sincerely,



Richard Spotts
1125 W. Emerald Drive
St. George UT 84770-6026
spotts@infowest.com

Note: In a subsequent e-mail, dated August 7, 2003, Mr. Spotts stated that had erroneously had referred to least terns in his August 5th letter and requested that the text be corrected to refer to piping plovers in the 3rd paragraph from the bottom.

2. Please see response 3 to PEER, response 8 to Friends of the Boundary Waters Wilderness, and response 9 to Brandt Mannchen.



"swainaa"
<swainaa@msn.com>
10/06/2003 03:08 PM
CST

To: <Apis_comments@nps.gov>
cc:
Subject: Wilderness Study

Wilderness Study Comments:

1. After reviewing the Draft Wilderness Study/Environmental Impact Statement, I recommend Alternative C with a couple of modifications. As a researcher who has done many studies over several decades that include fire history, tree reproduction, stump analysis, and several paleoecological analyses from island bogs, I recommend giving the large bog at the north end of the Stockton Island tombolo and most of Basswood Island outside of the camping area wilderness status. The bog on Stockton Island is still in pristine condition and was the site of one of my pollen studies. Basswood Island has some excellent hardwood forests with hemlock that is reproducing. Feel free to contact me if you have any questions regarding my comments.

Sincerely,
Albert M. Swain

Phone: 608-437-1963
104 Mayflower Circle
Blue Mounds WI 53517
e-mail: swainaa@msn.com

Response to Albert Swain

1. Although we agree that the bog on Stockton Island should be protected, we believe this can be done administratively and that wilderness designation is not necessary to provide further protection. This wetland would be protected under NPS policies whether or not it was designated as wilderness. See also response 6 to Friends of the Boundary Waters Wilderness.

With regard to the Basswood Island forests, we also agree that these forests should be protected, but this can be done without wilderness designation. There are other justifiable reasons why we believe this island should not be wilderness. See response 1 to the National Parks Conservation Association and response 2 to PEER.

10/16/03

Jim Nepstad
Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield WI 54814

Mr Nepstad,

PRESERVATION. The goal for an AINL management plan should be to manage the park in a manner that preserves the uniqueness of the resource for future generations.

UNIQUENESS. The AINL is a unique part of the national park system. While clearly representing a pristine wilderness environment, it also has multiple historical significance as a Native American settlement, early water transportation route, and European immigration and settlement in North America. Any management regimen must function on all these levels to succeed.

SUSTAINABILITY. Alternative B best balances all the needs at present. However, it may not fully anticipate the impact of increased use of the Lakeshore in the future, and the consequent challenge to its sustainability. The following suggestions regarding access and soundscape management address some of the sustainability issues before us.

1. **ACCESS.** In the future, the current wilderness experience may be challenged by overuse due to unprecedented access made possible by inevitable technological progress. To this end, modifying Alternative B to allow only non-motorized vessels access to designated islands (i.e., Bear, Cat, Ironwood, Otter) would protect an additional level of experience for the non-motorized patron, a significant and growing constituent of the Lakeshore. This level of access is not without precedent, as access to North Twin, Eagle, and Gull islands is currently restricted to an even greater degree and for the most part is self-enforcing.
2. **SOUNDSCAPE.** Thinking beyond the plan, the protection of the soundscape may be addressed by managing sources of noise pollution. Developing solutions in conjunction with other governmental agencies for managing the airspace above the Lakeshore as well as designating appropriate no-fly zones (similar to management of water areas for fish habitat) would contribute to maintaining a wilderness soundscape. In addition, an appropriate noise/speed/no-wake zone ordinance for boats, as is customary on most bodies of water, provides guidance to the responsible patron and a framework for management as needed. Also, group size can influence noise levels and could be managed via the existing camping permitting process.

Based on the request of the commenter, the name and address of this person has been withheld

1. This is not a reasonable or feasible modification for alternative B. We do not believe that closing the four islands you cited to motorboat use would protect or enhance the experience for nonmotorized users: people would still hear and see motorboats in the waters surrounding these islands. Most people who visit the islands arrive by motorboat. Your suggestion would discriminate against these users, preventing them from using four islands that have a long history of this use. In addition, even if we were to adopt this suggestion it would not be feasible to enforce the closure given the lack of a discernable boundary on the lake, the large number of motorboats in the area, and limited park staff and resources. (Gull and Eagle Islands are closed seasonally to all public access by superintendent order for the protection of sensitive nesting birds. This does not apply to the four islands you cited.)
2. The protection of the park's soundscape, including the designation of no-fly zones, noise/speed/no-wake zones, and group size restrictions, is beyond the scope of this wilderness study. If such actions were needed, they would be more appropriately addressed in a subsequent management plan and accompanying environmental document, with opportunities for public participation in the decision.

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54891

Dear NPS Decision-makers:

I am writing to you today to urge you in the strongest way I can, to please act now to protect the amazing Apostle Islands National Lakeshore as designated wilderness.

I ask you to implement a modified Alternative C, which designates most of the islands in the park as formal Wilderness Areas.

The changes I ask the NPS to implement to Alternative C, involve specifically the decision to designate Basswood Island as wilderness (but with the exception of the dock on the west side of the island and a quarry on the southern tip of the island), and the four items also listed below. With

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1. regards to the Basswood Island designation, designation with these exclusions is consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways; all public docks on the islands; and major cultural sites such as the six light stations and numerous historic residences and structures. There is no rational reason to exclude the entire Basswood Island wilderness from designation.

In addition, I also write to urge the NPS to:

2. * Make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore's suitability for wilderness - not based on politics or NPS plans for future development (if any).
3. * Take the appropriate measures to protect the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island. While Presque Island should not be included in the wilderness designation given its large number of administrative buildings, I am concerned about the tombolo and its need for protection, as it is highly sensitive to trampling.
4. * Address ways in which the NPS will protect the resident bear population from the encroachment of humans on both Stockton Island and Sand Island.

Responses to Bryan Wyberg

1. While we agree that Basswood Island is suitable for wilderness designation, we believe there are other justifiable reasons for not including the island in the NPS wilderness proposal. See response 1 to the National Parks Conservation Association and response 2 to PEER.
2. See responses 3 and 4 to Friends of the Boundary Waters Wilderness and response 2 to PEER.
3. See response 6 to Friends of the Boundary Waters Wilderness.
4. See response 7 to Friends of the Boundary Waters Wilderness.

5. * Ensure the continuing protection of the more than 100 bird species using the Apostle Islands as an important migratory flyway stop-over in the Great Lakes region. Specifically, the piping plover is an endangered species, and Long Island, which would no longer be protected as wilderness in Alternative C, is the only place where plovers nest in Wisconsin. At the minimum, I feel that the final Wilderness Study must include a discussion of how the NPS will comply with its legal responsibility to "not adversely modify or destroy critical habitat" when Long Island changes from de facto wilderness to non-wilderness, should that be the unfortunate final decision on this matter.

I have written to the NPS several times in the course of this wilderness study public involvement process. Each time I write asking for the greatest amount of these treasured islands to be designated as formal wilderness. I love these islands, and I want them preserved for future generations. This also aligns with the intentions of the State of Wisconsin, when it deeded the islands to the federal government to begin with.

The islands of the Apostle Islands National Lakeshore are unique treasures deserving of formal wilderness designation because of their old-growth forests, high hills and steep valleys, and red sandstone bluffs and intricate sea caves. Unchanged in use will be the surrounding waterways (not slated to be designated as wilderness), which provide recreational opportunities for a variety of park users (users of kayaks, motorboats and sailboats).

So again, please select Alternative C, as modified by the above four points and the inclusion of the majority of Basswood Island, as the final position of the Wilderness Study. Future generations of Americans will thank you for maximizing the wilderness protections you afford these natural jewels.

Thank-you,

Bryan Wyberg
12854 Raven Street NW
Coon Rapids, MN 55448
bryan.wyberg@honeywell.com

5. See response 8 to the Friends of the Boundary Waters Wilderness, response 9 to Brandt Mannchen, and response 1 to Emmet Judzewicz.

Oral Comment at the Stockton Public Meeting

Comment : In order to maximize flexibility with respect to docks in the future, the wilderness boundaries should be drawn around all areas where docks have existed historically.

Response to Oral Comment at the Stockton Public Meeting

Response : Adding additional nonwilderness areas to encompass all areas where docks have existed would not be consistent with one of the intents of the preferred alternative, which was to minimize the number of small, fragmented areas of wilderness or nonwilderness. We also believe that the proposed exclusion areas in the preferred alternative include sufficient area for the installation of additional docks, should that be determined to be necessary and feasible in the future. It would also be possible to expand most existing docks if necessary. The development of additional docks or the expansion of existing docks would be considered in a future management plan and accompanying environmental document.